



UNIVERSITY OF
GEORGIA

Risk and Resiliency Division

240A Riverbend Road, Athens, Georgia 30602

Environmental Effects Report

Proposed redevelopment of the University of Georgia Legion Pool Complex

(Legion Field, Legion Pool #2604, and Bathhouse/Pavilion #2605)

802 S. Lumpkin Street, Athens, Clarke County, Georgia

Prepared: November 4, 2025

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Attachments

- A. Geo-Hydro Engineers GEPA Evaluation
- B. University of Georgia Final Report Working Group dated August 1, 2025
- C. Georgia Historic Preservation Division Environmental Review Form Submission
- D. Letter from Georgia Department of Community Affairs, Deputy State Historic Preservation Officer, SP-251001-001, October 23, 2025
- E. Historic Resource Study: Legion Pool Complex at the University of Georgia prepared by Brockington Consulting, June 2025
- F. Letter from Nutter and Associates, Archaeological Survey of the West Precinct Legion Block, 2023-002, April 18, 2023
- G. Counsilman-Hunsaker Legion Pool Swimming Pool Audit, Updated July 14, 2025
- H. UGA Today article “UGA to redevelop Legion Pool, Legion Field to better serve and support students”, September 25, 2025
- I. UGA Today article “Revitalized Legion Field to enhance the student experience”, October 10, 2025
- J. BCP Environmental Pre-Demolition Hazardous Building Materials Survey Report
- K. Legion Pool Utility Use Report FY 23-25
- L. GEPA adverse impacts determination

EXECUTIVE SUMMARY

The University of Georgia convened a working group in early 2025 to evaluate the future of the Legion Pool Complex (Legion Field, Legion Pool #2604 and Bathhouse/Pavilion #2605), with a focus on student needs and campus priorities. The group reviewed usage and financial data, a professional pool audit, planning and historic resource studies, and conducted site visits and benchmarking analyses. Input was gathered from student leaders and campus units, including the Tate Student Center, University Architects, Real Estate, and Legal Affairs.

Based on findings related to student usage, financial sustainability, capital investment needs, and redevelopment potential, the group recommended redeveloping the site to better serve UGA's growing student population. Proposed actions include:

- Removing Legion Pool (#2604) and its bathhouse/pavilion (#2605).
- Expanding Legion Field to create an open community green space and amphitheater using the site's natural topography.
- Adding 70 student parking spaces to meet critical demand near residence halls and key campus facilities.

This redevelopment aims to enhance student access to recreational, co-curricular, and community spaces while improving financial and operational sustainability.

ENVIRONMENTAL EFFECTS REPORT

The Georgia Environmental Policy Act (GEPA) requires an Environmental Effects Report (EER) if a proposed governmental action may significantly adversely affect the quality of the environment. Environment is defined to include impact to historical sites or buildings. The proposed Legion Pool Complex redevelopment project will impact the historic Legion Pool, Legion Pool Bathhouse/Pavilion, and Legion Field. UGA worked with several consultants and state agencies to compile this EER.

I. The environmental impact of the proposed governmental action.

The only significant environmental impacts anticipated involve disturbance of historic properties. Impact information is outlined in Attachment A – *Geo-Hydro Engineers GEPA Evaluation*, Attachment C- *Georgia Historic Preservation Division Environmental Review Form Submission*, Attachment D - *Letter from Georgia Department of Community Affairs, Deputy State Historic Preservation Officer, SP-251001-001, October 23, 2025*, Attachment E - *Historic Resource Study: Legion Pool Complex at the University of Georgia prepared by Brockington Cultural Resources Consulting, June 2025*, and Attachment L - *GEPA adverse impacts determination*.

II. Alternatives to the proposed governmental action, including no action.

Several alternatives to removal of Legion Pool and the Legion Pool Bathhouse/Pavilion were explored, including making costly repairs to the pool facilities (estimated cost between \$1 million and \$2.5 million) and full replacement of the facility (estimated cost of \$11.4 million). Those alternatives are outlined in Attachment B - *University of Georgia Final Report Working Group dated August 1, 2025* and Attachment G - *Councilman-Hunsaker Legion Pool Swimming Pool Audit, Updated July 14, 2025*.

Taking no action, which would consist of continuing to utilize the facilities in their current state, is likely to result in continued operations at a net loss, poor stewardship of water resources, and potential closing of the facilities when the equipment no longer functions and a health permit can no longer be obtained. Attachment G outlines current deficiencies with pool operations.

III. Any adverse environmental effects which cannot be avoided if the proposed governmental action is undertaken.

The proposed action of demolishing Legion Pool and the Legion Pool Bathhouse/Pavilion are adverse environmental actions as identified in Attachment A – *Geo-Hydro Engineers GEPA Evaluation*, Attachment C - *Georgia Historic Preservation Division Environmental Review Form Submission* and Attachment D - *Letter from Georgia Department of Community Affairs, Deputy State Historic Preservation Officer, dated October 23, 2025*.

IV. Mitigation measures proposed to avoid or minimize the adverse impact of the governmental action.

The proposed mitigation is the development of a Permanent Archival Record (PAR) of the Legion Pool Complex following State Historic Preservation Office guidelines. This is consistent with previous documentation of historic properties on campus. Photographic documentation will be stored for public review at the University of Georgia Richard B. Russell Jr. Special Collections Libraries.

V. The relationship between the value of the short-term uses of the environment involved in the proposed governmental action and the maintenance and enhancement of its long-term value.

The short- and long-term benefits of the proposed project are outlined in Section VIII below. Mitigation of any long-term environmental (historical) impacts are outlined in Section IV above.

Additional context related to short-term versus long-term impacts can be found in Attachment B - *University of Georgia Final Report Working Group dated August 1, 2025*, Attachment H - *UGA Today article “UGA to redevelop Legion Pool, Legion Field to better serve and support students”, September 25, 2025*,

and Attachment I - *UGA Today* article “Revitalized Legion Field to enhance the student experience”, October 10, 2025.

VI. The effect of the proposed governmental actions on the quality and quantity of water supply.

The proposed action will have no anticipated negative impact on the quality and quantity of water supply.

VII. The effect of the proposed governmental action on energy use or energy production.

The proposed action will have no anticipated negative impact on energy use or energy production.

VIII. Any beneficial aspects of the proposed governmental action, both short-term and long-term, and its economic advantages and disadvantages.

- **Increased Student Use:** Currently, fewer than 2.5% of UGA students use Legion Pool annually. The proposed redevelopment will transform the site into a year-round resource for approximately 5,000 nearby residential students, significantly increasing engagement.
- **Enhanced Community Space:** Expanding Legion Field into a green space, like Myers and Reed Quads, provides vital opportunities for outdoor study, recreation, and student-led programming.
- **Critical Parking Relief:** The addition of 70 student parking spaces addresses a high-priority need in the densely populated central campus area.
- **Economic Efficiency:** While initial redevelopment costs are expected, eliminating pool operations will reduce ongoing expenses. The new green space and parking will require standard campus maintenance, easing the financial burden on Student Activity Fee reserves.
- **Student Preference Alignment:** Investing in green space and parking over maintaining a seasonal-use pool aligns with student preferences and long-term campus planning.
- **Energy Efficiency:** The proposed redevelopment is expected to significantly reduce water and electricity use at the Legion Pool Complex. From FY 2023–2025, the pool averaged approximately 671,000 gallons of water and 22,000 kWh of electricity use per month when open, compared to just 3,905 gallons and 3,900 kWh when closed. (See Attachment K - *Legion Pool Utility Use Report FY 23-25.*)

ATTACHMENT A

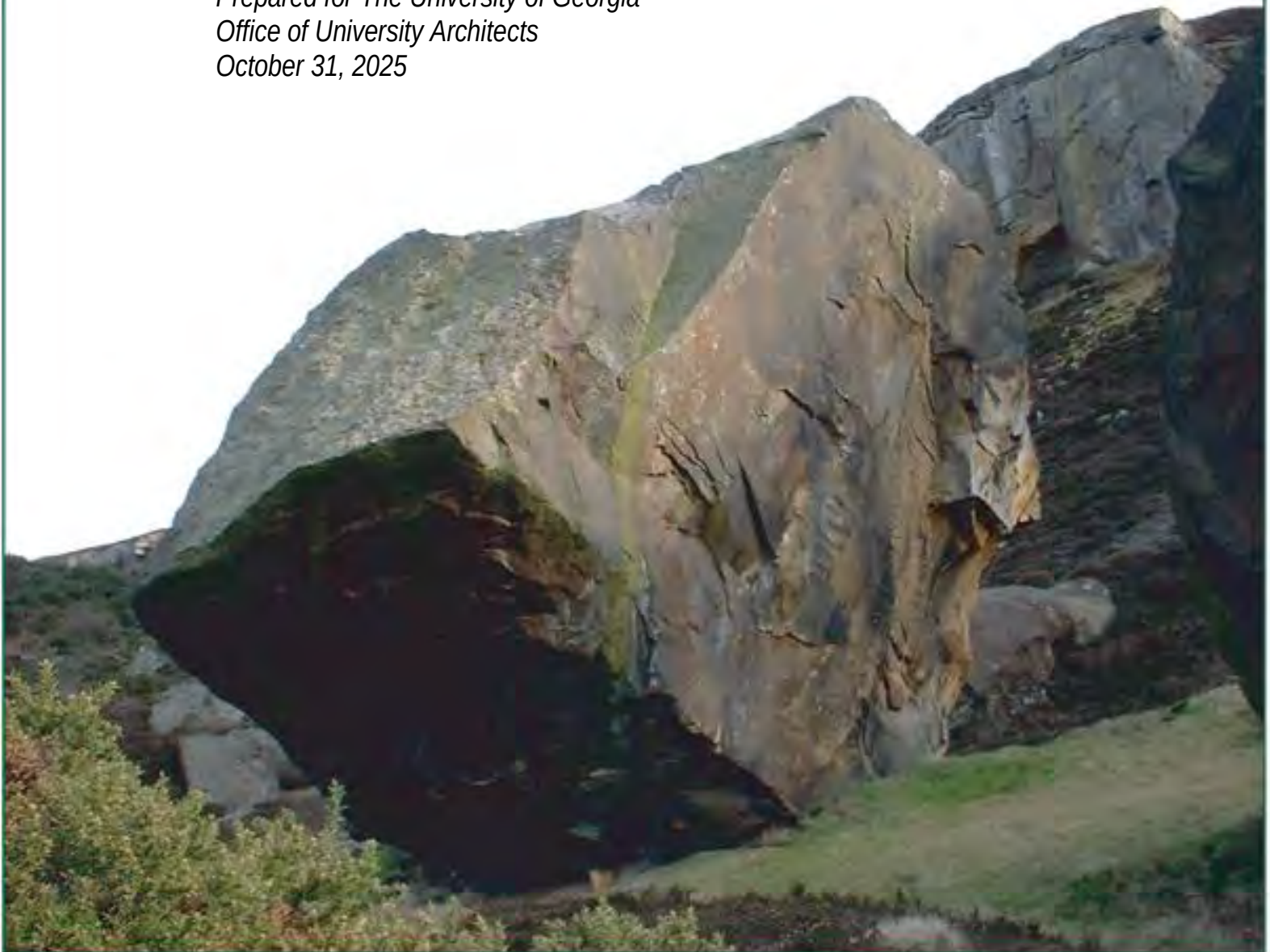
Geo-Hydro Engineers GEPA Evaluation



Report of Georgia Environmental Policy Act (GEPA) Evaluation

UGA Legion Pool
802 S. Lumpkin Street
Athens, Clarke County, Georgia
Geo-Hydro Project Number 252779.30

*Prepared for The University of Georgia
Office of University Architects
October 31, 2025*



Mr. Scott Messer
The University of Georgia
Office of the University Architects
1180 East Broad Street
Athens, Georgia 30602

October 31, 2025

Report of
Georgia Environmental Policy Act Evaluation
UGA Legion Pool
802 S Lumpkin Street
Athens, Clarke County, Georgia
Geo-Hydro Project Number 252779.30

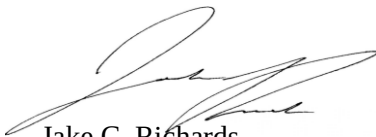
Mr. Messer:

Geo-Hydro Engineers, Inc. (Geo-Hydro) has completed the requested Georgia Environmental Policy Act (GEPA) Evaluation. The primary purpose of the GEPA evaluation is to consider potential adverse impacts associated with the project site consisting of the Legion Field and Pool, Bathhouse, and Pavilion within a portion of a parcel approximately 14.08-acres located at 802 South Lumpkin Street in Athens, Clarke County, Georgia. The parcel is identified by Athens-Clarke County Parcel ID: 171 001L. This report and our observations are intended for the benefit of The University of Georgia (UGA) Office of University Architects and the Board of Regents of the University System of Georgia and may not be used or relied upon by any other party without our prior written consent.

Geo-Hydro has appreciated the opportunity to provide this GEPA evaluation. If you have any questions concerning this report or if we can be of further assistance, please contact us.

Sincerely,

GEO-HYDRO ENGINEERS, INC.



Jake C. Richards
Staff Geologist
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Environmental Services Director
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JCR/LJB/252779.30 UGA Legion Pool GEPA Report

INTRODUCTION

This Georgia Environmental Policy Act (GEPA) evaluation has been performed on the project site consisting of the Legion Field and Pool, Bathhouse, and Pavilion within a portion of a parcel approximately 14.08-acres located at 802 South Lumpkin Street in Athens, Clarke County, Georgia. The parcel is identified by Athens-Clarke County Parcel ID: 171 001L. The project site is currently occupied by the UGA Legion Field and Pool. The purpose of this evaluation was to consider the history and the current status of the project site as it relates to the proposed plans to develop the site. This evaluation has been prepared in accordance with GEPA guidelines as provided by the Board of Regents of the University System of Georgia.

SITE DESCRIPTION

The project site consisting of the Legion Field and Pool, Bathhouse, and Pavilion consisting of an approximately 2-acre tract that is a portion of a the larger 14.08-acre parcel located at 802 South Lumpkin Street in Athens, Clarke County, Georgia. The parcel is identified by Athens-Clarke County Parcel ID: 171 001L. The project site is currently occupied by the UGA Legion Field and Pool.

The UGA Legion Pool project site is located at 802 South Lumpkin Street in Clarke County, Georgia (Plates 1-3). The project site currently consists of the UGA Legion Field and Pool which is within the project site's boundaries. The subject property is adjoined to the north by Black-Diallo-Miller Hall across East Cloverhurst Avenue (Plate 4). The subject property is adjoined to the west by Legion Field (Plate 5). The subject property is adjoined to the south by multiple student dormitories (Plate 6). The subject property is adjoined to the east by the Legion Parking Lot (Plates 7). The approximate subject property boundaries and the immediate surrounding properties are shown on Figure 3.

REVIEW OF ENVIRONMENTAL IMPACTS

1. WETLANDS: Will the action occur in a “wetlands” area?

A review of the U.S. Fish and Wildlife (USFWS) National Wetlands Inventory (NWI) database for the project site and surrounding properties could not be completed at the issuance of this report due to National Wetlands Inventory website being non-operational due to the current government shutdown. Although the project site could not be reviewed via the National Wetlands Inventory website, the project site does not appear to contain any streams or wetlands at this time. It should be noted that Geo-Hydro did not perform a formal wetlands delineation for the project site.

2. FLOOD PLAIN/RIVER CORRIDOR: Will the action occur in a flood plain or a river corridor?

Based on review of the Georgia Department of Natural Resources (Georgia DNR) and United States Geological Survey (USGS) Digital Environmental Atlas of Georgia, *River Corridors*, the project site is not located within a river corridor. Georgia DNR defines a river corridor as 100-foot strips of land that flank major river reaches with a mean annual flow of 400 cubic feet per second or greater.

Based on a review of the Federal Emergency Management Administration (FEMA) Flood Rate Insurance Map (FIRM) for the city of Athens, Georgia, Map Number 13059C0025F (September 15, 2022) the project site is not within a special flood hazard area or flood plain. A copy of the FIRM Map showing the project site is included in the Appendix.

3. WATER SUPPLY: Does the proposed action have the potential for decreasing either the quality or quantity of water available for water supply?

It is not anticipated that any proposed redevelopment of the project site will result in a significant decrease in the quality or quantity of water available for water supply.

4. WATER RESOURCES: Will the proposed action result in a large demand for water from the available water resources? Will the proposed action result in a degradation of the quality of waters of the state?

It is not anticipated that any proposed redevelopment of the project site will result in large demand or degrade the quality of waters of the state.

5. GROUNDWATER RECHARGE AREA: Will the action result in the disturbance or altering of a groundwater recharge area?

Based on review of the Georgia DNR USGS, *Most Significant Groundwater Recharge Areas*, Hydrologic Atlas 18 Map, Athens is not located in an unconfined aquifer area of significant groundwater recharge. Based on review of Georgia DNR geologic maps, the project site is located in the Piedmont physiographic province of Georgia, and the project site is located in an area of generally clay loam soils. It is not anticipated that any proposed redevelopment of the project site would disturb or alter the groundwater recharge area. A copy of the Georgia DNR USGS, *Most Significant Recharge Areas of Georgia, Digital Data Map* is included in the Appendix.

6. STORM WATER: Will the project result in increasing the amount of storm water runoff for downstream property?

Although specific stormwater management plans for the project site have not been presented at this time, it is not anticipated that any proposed redevelopment of the project site would create greater impervious surface area than it currently does. During any future site modifications, special care should be taken to ensure a proper storm water management plan is in place to prevent increased storm water runoff from affecting downstream properties.

7. WASTEWATER: Will the project produce wastewater that is discharged to a surface stream?

It is not anticipated that any proposed redevelopment of the project site will produce wastewater that is discharged to a surface stream.

8. AIR QUALITY: Will the action result in a release or discharge of contaminants into the ambient air?

It is not anticipated that any proposed redevelopment of the project site will result in a release of regulated air emissions.

9. SOLID WASTES: Will the project result in the generation of solid wastes for disposal, or will the proposed actions occur near or in an active or closed landfill?

Proposed redevelopment of the project site may result in the generation of solid waste for disposal. If future redevelopment does produce solid waste, special care should be taken to ensure any solid waste is properly disposed.

10. SOIL STABILITY/ERODABILITY: Will the action displace soils that will be carried off site and pose a threat to surface waters or property?

Proposed redevelopment of the project site would not displace soils that will be carried off site and pose a threat to surface waters or property provided a sediment and erosion control plan is in place, as required by law, and adhered to during development. A land disturbance permit will be required if proposed development includes land disturbing activities.

11. PROTECTED MOUNTAINS: Will the project involve the alteration of lands with high elevations and steep slopes?

The project site is not defined as a “Protected Mountain” because the site is less than 2,200 feet in elevation. Based on review of the USGS 7.5-minute quadrangle map for Athens, Georgia, the ground surface elevation at the project site ranges from approximately 700 to 740 feet above mean sea level. It is not anticipated that the project site will result in alteration of steep slopes.

12. PROTECTED SPECIES: Will the proposed action harm or reduce the population of protected species?

Based on review of the USFWS Information for Planning and Consultation (IPaC) Georgia Ecological Services Field Office species list, three federally protected, proposed protected, or candidate species are listed as their potential range overlapping the project site: gray bat (*Myotis grisescens*; endangered), tricolored bat (*Perimyotis subflavus*; proposed endangered), and monarch butterfly (*Danaus plexippus*; proposed threatened). The Georgia DNR rare elements report for Clarke County was also reviewed, and one additional federally protected species, rusty-patched bumblebee (*Bombus affinis*; endangered), is listed as occurring within the Athens West Quarter Quad, which includes the project site. Copies of the USFWS IPaC Georgia Ecological Services Field Office species list, and the Georgia DNR rare elements list for Clarke County are included in the Appendix.

Per the Georgia DNR species profile for gray bat, this species is very cave dependent, and gray bats roost and hibernate exclusively in suitable caves in the southeastern United States. Less than 5% of available caves in the southeastern U.S. have the right properties of temperature, humidity, and structure to make them suitable for gray bat occupation.

Per Environmental Conservation Online System species profile for tricolored bats roost in suitable caves, abandoned mines, road-associated culverts, and trees. This species has greatly declined after 2006 from the effects of a fungal disease (white-nose syndrome).

Per the NatureServe species profile for monarch butterfly, habitat is a complex issue for this species. Butterflies utilize flowering plants for gathering nectar and pollen, and during the breeding season, monarchs lay their eggs on their obligate milkweed host plant (primarily *Asclepias* spp.) which larvae feed on after emerging (USFWS ECOS species profile).

At the time of our site visit, no individuals of any of these species were identified on the project site. The project site consists of developed land; no known caves are present on or adjacent to the project site. Monarch butterflies may utilize flowering plants if present on site, but adults of these species are highly mobile insects that may leave an area if disturbed. Therefore, it is not anticipated that any proposed redevelopment of the project site will result in harm or reduce the population of protected species.

13. CRITICAL HABITATS: Is the proposed action expected to involve any critical habitats?

Based on review of the USFWS Critical Habitat mapper and the USFWS IPaC, there are no critical habitats within the project site. A copy of the USFWS IPaC report is included in the Appendix.

14. HISTORICAL: Will the proposed action involve disturbance of any historic properties?

A review of the National Register of Historic Places (NRHP) did not identify the project site as having registered historic places on site. A copy of the NRHP information is included in the Appendix.

A Historic Resource Study and review letter, issued by the Historic Preservation Division (HPD), was provided by the Office of the University of Architects for the University of Georgia along with a Historic Resource Study Report prepared by Brockington and Associates, Inc. in June of 2025. Based on a review of the Historic Resource Study Report, HPD concurred that concurs that the Legion Pool Landscape Character Area/No. 14 is eligible for listing in the Georgia National Register of Historic Places and that Legion Pool, the associated service building/bathhouse, and pavilion contribute to the eligible character area and are considered UGA Category 2 buildings per the UGA Historic Preservation Master Plan (HPMP). Based on this information, demolition of these structures through proposed redevelopment of the project site is considered a significant impact. A copy of the Historic Resource Study and HPD review letter is included in the Appendix.

15. ARCHEOLOGICAL: Will the proposed action involve disturbance of any archeological property?

The UGA Laboratory of Archaeology conducted a site file review to determine the presence/absence of any previously recorded archeological sites within a one-mile radius of the subject property. The UGA file review identified 36 archeological sites and 38 projects within a one-mile radius of the subject property. Based on the current conditions of the site, we do not anticipate that any proposed

redevelopment of the project site would impact or disturb the identified archaeological sites. A copy of the UGA Archeological report abstract is included in the Appendix.

In addition to the UGA Laboratory of Archaeology site file review, the Office of the University of Architects for the University of Georgia also provided an Archaeological Survey prepared by Nutter and Associates (NAI) for the West Precinct Legion Block which includes the current project site. NAI determined that the archaeological site potential for the Legion Pool Complex appears to be very low to nonexistent and concluded that the presence of significant cultural resources was nonexistent. Based on this information it is not anticipated that any proposed redevelopment of the project site will result in the disturbance of any archeological property. A copy of the archaeological investigation is included in the Appendix.

16. PARKS/RECREATION: Will the proposed action involve disturbance or otherwise have a significant impact on the State's cultural resources?

Proposed redevelopment of the project site is not anticipated to significantly disturb or impact State cultural resources. The project site is not located within parks, preserves, or other public lands or areas of recognized scenic or recreational value. A copy of the Georgia DNR States Parks and Historic Sites Map is included in the Appendix.

17. ENERGY SUPPLIES: Will the proposed action have a significant impact on the reduction in the available energy supplies?

It is not anticipated that any proposed redevelopment of the project site will have an impact on the reduction in the energy supplies available in the project site area.

18. BEACHES: Will the proposed action involve the disturbance of any ocean beach area?

The project site is not located within a beach area.

19. DUNES: Will the proposed activity alter coastal sand dunes?

The project site is not located within a sand dune area.

20. SHORELINE: Will the project involve activities in the Georgia Coastal shoreline area or in areas covered under the river corridor protection requirements of Georgia House Bill 643?

The project site is not located in the Georgia Coastal shoreline area. Based on review of the Georgia Department of Natural Resources (Georgia DNR) United States Geological Survey (USGS) Digital Environmental Atlas of Georgia, *River Corridors*, the project site is not located within a river corridor. Georgia DNR defines a river corridor as 100-foot strips of land that flank major river reaches with a mean annual flow of 400 cubic feet per second or greater.

21. COASTAL MARSHLANDS: Will the proposed action alter the Georgia coastal marshland environment?

The project site is not located within or near a coastal marshland environment.

22. FOREST LAND: Will the proposed action involve changes in forested lands?

The project site is not wooded and due to the nature of the proposal there should be no change in the forested areas off-site. In addition, the project site is not part of any State or National Forest as documented by the Athens West, Georgia, USGS topographic quadrangle map.

23. BARRIER ISLAND: Will the proposed action involve activity on or near a barrier island?

The project site is not located on or near a barrier island.

24. AQUATIC LIFE/TROUT STREAMS: Will the proposed action involve an action that significantly impacts freshwater aquatic life?

Based on review of the USGS national hydrography dataset (NHD), no streams are located on the project site. It is not anticipated that any proposed redevelopment of the project site would impact any stream. Therefore, it is not anticipated that the project site will impact aquatic life and/or trout streams.

DATA EVALUATION AND IMPACT ASSESSMENT

Based on our research and investigation, no significant environmental impacts are anticipated to occur from the potential redevelopment involving the project site except for the following:

- Based on a review of the Historic Resource Study Report, the Historic Preservation Division of the Georgia Department of Community Affairs has determined the Legion Pool Landscape Character Area/No. 14 is eligible for listing in the Georgia National Register of Historic Places and that Legion Pool, the associated service building/bathhouse, and pavilion contribute to the eligible character area and are considered UGA Category 2 buildings per the UGA Historic Preservation Master Plan (HPMP). Therefore, demolition of these structures through proposed redevelopment of the project site is considered a significant impact, and an Environmental Effects Report (EER) appears warranted at this time.

LIMITATIONS

This GEPA evaluation was prepared in conformance with the scope and limitations of the GEPA guidelines as provided by the Board of Regents of the University System of Georgia. No environmental evaluation can wholly eliminate uncertainty regarding the potential for environmental impacts in connection with a site. No other warranty or guarantee is expressed or implied.

This GEPA evaluation has been prepared for the benefit of The University of Georgia (UGA) Office of University Architects and the Board of Regents of the University System of Georgia and may not be used or relied upon by any other party without our prior written consent.

INITIAL GEPA EVALUATION FORM

AREA/CATEGORY	IS AREA AFFECTED?			IF AFFECTED, HOW SEVERELY?			
	NO	YES	UNKNOWN	MINOR	MEDIAN	MAJOR	UNKNOWN
1. Wetlands	X						
2. Flood Plain/River Corridor	X						
3. Water Supply	X						
4. Water Resources	X						
5. Groundwater Recharge	X						
6. Storm Water	X						
7. Wastewater	X						
8. Air Quality	X						
9. Solid Wastes	X						
10. Soil Stability/Erodibility	X						
11. Protected Mountains	X						
12. Protected Species	X						
13. Critical Habitats	X						
14. Historical		X				X	
15. Archeological	X						
16. Parks/Recreation	X						
17. Energy Supplies	X						
18. Beaches	X						
19. Dunes	X						
20. Shoreline	X						
21. Estuary	X						
22. Forest Land	X						
23. Barrier Island	X						
24. Aquatic Life/Trout Streams	X						

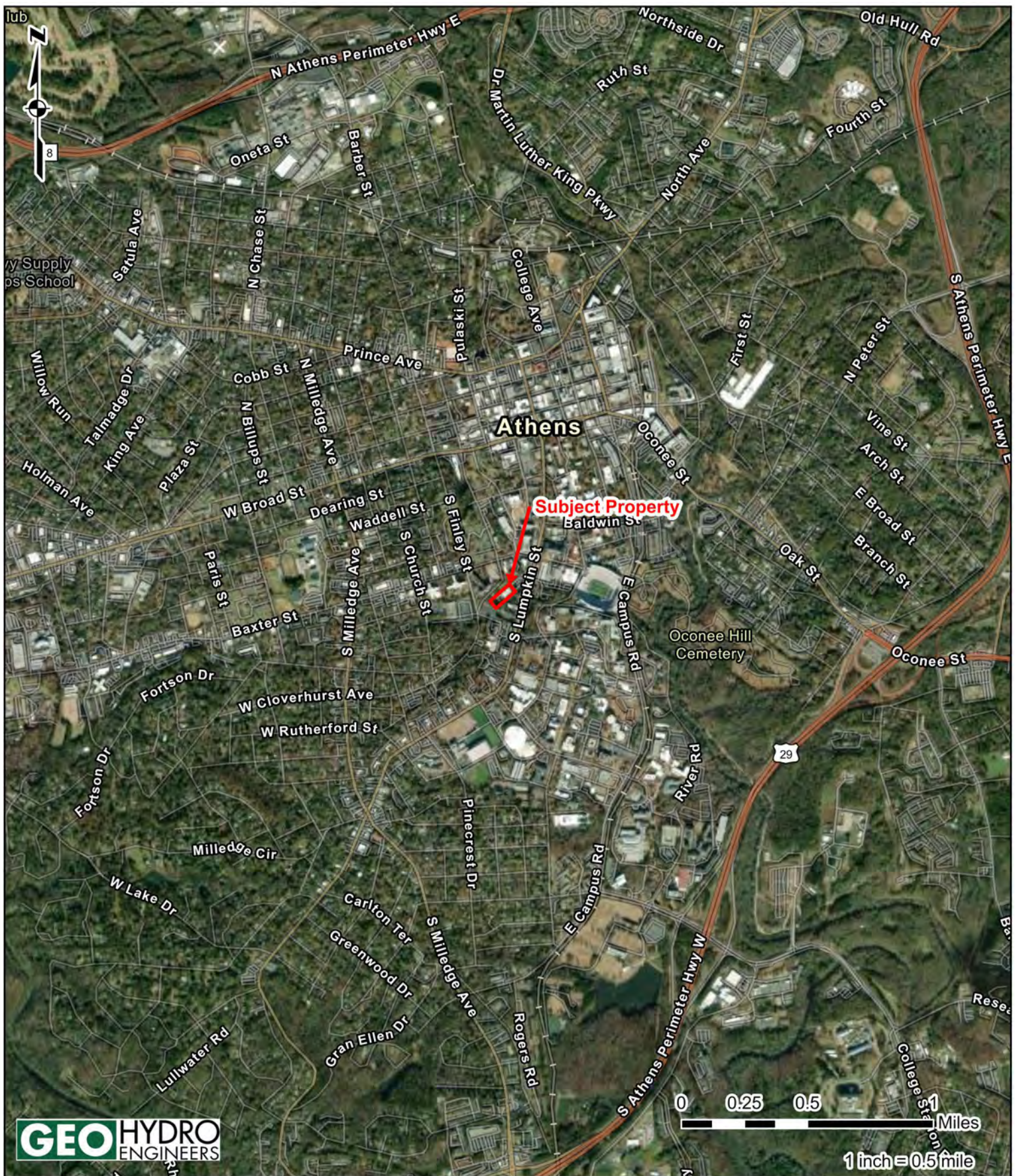
Project No.: 252779.30
 Project Name: UGA Legion Pool GEPA
 Institution: The University of Georgia/The University of Georgia Office of University Architects
 Date of Assessment: October 30, 2025
 Brief Project Description: UGA Legion Pool

According to the review of this proposed project and the Environmental Checklist, there are no significant adverse environmental effects resulting from the potential redevelopment involving the project site except for the following:

- Based on a review of the Historic Resource Study Report, the Historic Preservation Division of the Georgia Department of Community Affairs has determined the Legion Pool Landscape Character Area/No. 14 is eligible for listing in the Georgia National Register of Historic Places and that Legion Pool, the associated service building/bathhouse, and pavilion contribute to the eligible character area and are considered UGA Category 2 buildings per the UGA Historic Preservation Master Plan (HPMP). Therefore, demolition of these structures through proposed redevelopment of the project site is considered a significant impact, and an Environmental Effects Report (EER) appears warranted at this time.

Appendix 1

Figures and Photographs



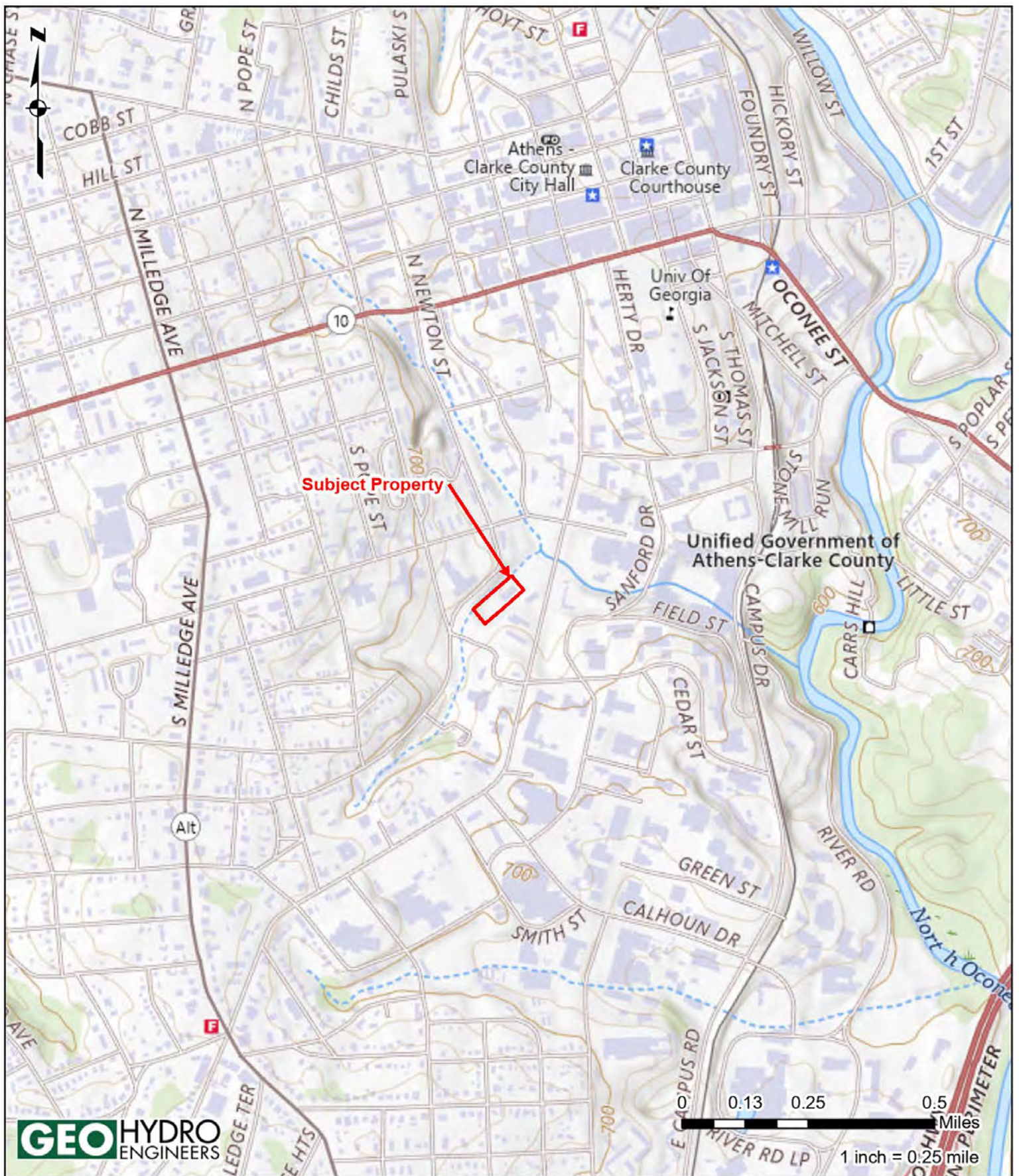


Figure 2. USGS Topographic Map
 UGA Legion Pool GEPA
 802 South Lumpkin Street
 Athens, Clarke County, Georgia
 Geo-Hydro Project Number 252779.30

Legend

Site Location



Figure 3. Site Location Plan
 UGA Legion Pool GEPA
 802 South Lumpkin Street
 Athens, Clarke County, Georgia
 Geo-Hydro Project Number 252779.30

Legend

 Site Location



Plate 1: View – Southwest. The subject property is comprised of the Legion Pool and field, Bathhouse, and Pavilion within a portion of a parcel approximately 14.08-acres located at 802 South Lumpkin Street in Athens, Clarke County, Georgia.



Plate 2: View – West. The parcel is identified by Athens-Clarke County Parcel IDs: 171 001L.



Plate 3: View – South. The subject property is comprised of the Legion Pool, Bathhouse, and Pavilion within a portion of a parcel approximately 14.08-acres located at 802 South Lumpkin Street in Athens, Clarke County, Georgia.



Plate 4: View – North. The subject property is adjoined to the north by Black-Diallo-Miller Hall across East Cloverhurst Avenue.



Plate 5: View – West. The subject property is adjoined to the west by Legion Field.



Plate 6: View – East. The subject property is adjoined to the south by multiple student dormitories.



Plate 7: View – East. The subject property is adjoined to the east by the Legion Parking Lot.

Appendix 2

National Wetlands Inventory Map

Unavailable due to Government Shutdown

Appendix 3

River Corridors of Georgia Map

RIVER CORRIDORS OF GEORGIA

DIGITAL DATA

1991

SCALE 1:833,000

1 inch represents 10 miles



EXPLANATION

- River with a mean annual flow of 500 cfs or greater
- Hydrography
- Lake, Reservoir, River, or Ocean

Map of Georgia River Corridors of Georgia, River Corridors
 by the Georgia Department of Transportation, 1991
 Prepared by the Georgia Department of Transportation
 Department of River Resources, Georgia Survey, Data and Records
 Section, 1000 Peachtree Street, N.W., Atlanta, Georgia 30309
 Printed on 100% recycled paper, 100% post-consumer waste

Digital data were prepared from the Georgia Department of Transportation
 Department of River Resources, Georgia Survey, Data and Records
 Section, 1000 Peachtree Street, N.W., Atlanta, Georgia 30309
 Prepared by the Georgia Department of Transportation
 Department of River Resources, Georgia Survey, Data and Records
 Section, 1000 Peachtree Street, N.W., Atlanta, Georgia 30309

Map prepared by the Georgia Department of Transportation, 1991
 with updates and corrections by the Georgia Department of Transportation,
 1991

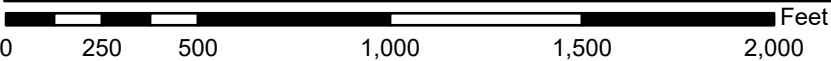
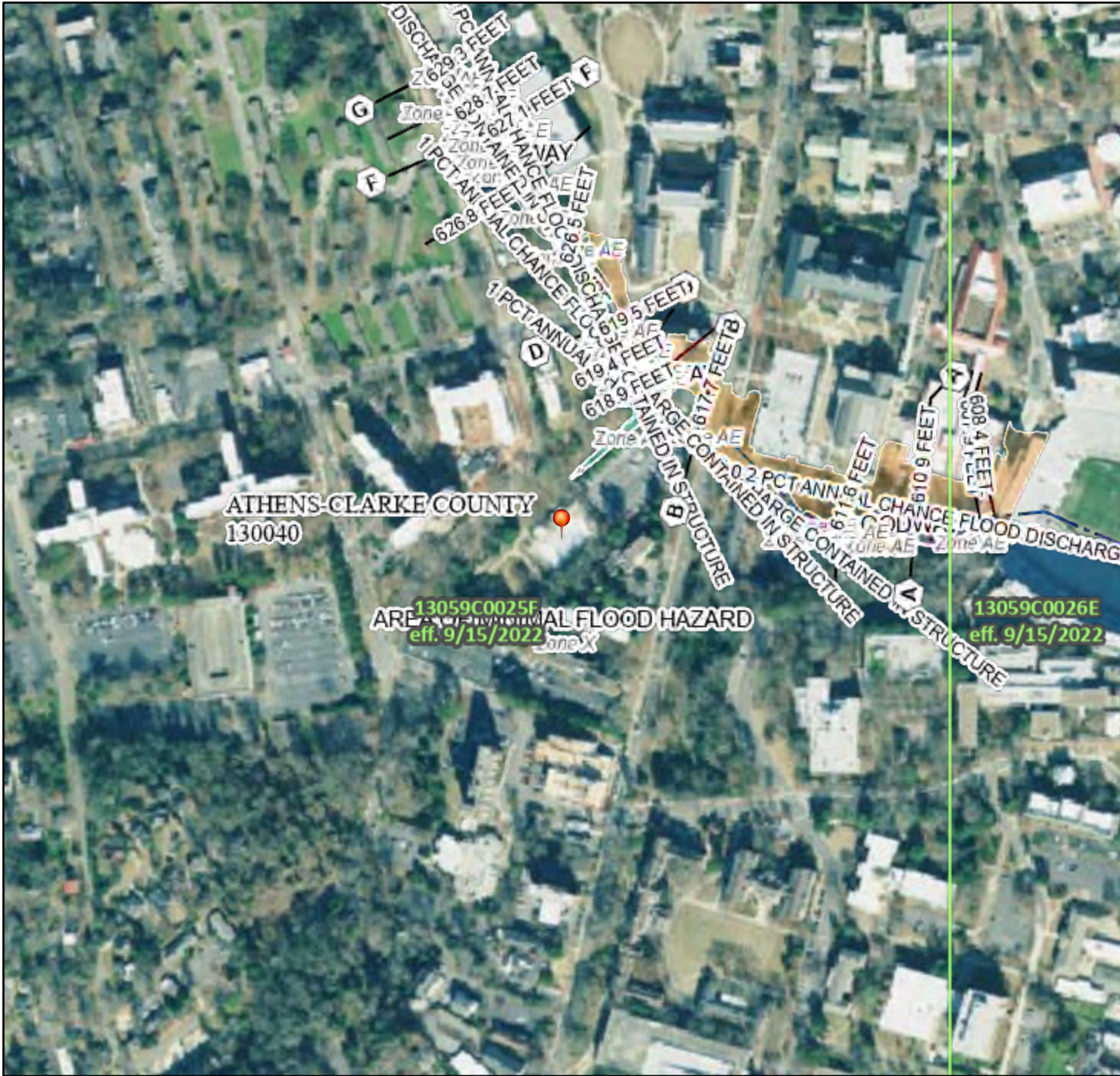
Appendix 4

Flood Rate Insurance Map (FIRM)

National Flood Hazard Layer FIRMMette



83°23'2"W 33°57'14"N



1:6,000

83°22'24"W 33°56'44"N

Basemap Imagery Source: USGS National Map 2023

Legend

SEE FIS REPORT FOR DETAILED LEGEND AND INDEX MAP FOR FIRM PANEL LAYOUT

SPECIAL FLOOD HAZARD AREAS		Without Base Flood Elevation (BFE) Zone A, V, A99
		With BFE or Depth Zone AE, AO, AH, VE, AR
		Regulatory Floodway
OTHER AREAS OF FLOOD HAZARD		0.2% Annual Chance Flood Hazard, Areas of 1% annual chance flood with average depth less than one foot or with drainage areas of less than one square mile Zone X
		Future Conditions 1% Annual Chance Flood Hazard Zone X
		Area with Reduced Flood Risk due to Levee. See Notes. Zone X
		Area with Flood Risk due to Levee Zone D
OTHER AREAS		NO SCREEN Area of Minimal Flood Hazard Zone X
		Effective LOMRs
GENERAL STRUCTURES		Area of Undetermined Flood Hazard Zone D
		Channel, Culvert, or Storm Sewer
		Levee, Dike, or Floodwall
		20.2 Cross Sections with 1% Annual Chance Water Surface Elevation
		17.5 Coastal Transect
		Base Flood Elevation Line (BFE)
		Limit of Study
		Jurisdiction Boundary
OTHER FEATURES		Coastal Transect Baseline
		Profile Baseline
		Hydrographic Feature
MAP PANELS		Digital Data Available
		No Digital Data Available
		Unmapped



The pin displayed on the map is an approximate point selected by the user and does not represent an authoritative property location.

This map complies with FEMA's standards for the use of digital flood maps if it is not void as described below. The basemap shown complies with FEMA's basemap accuracy standards

The flood hazard information is derived directly from the authoritative NFHL web services provided by FEMA. This map was exported on **10/14/2025 at 1:38 PM** and does not reflect changes or amendments subsequent to this date and time. The NFHL and effective information may change or become superseded by new data over time.

This map image is void if the one or more of the following map elements do not appear: basemap imagery, flood zone labels, legend, scale bar, map creation date, community identifiers, FIRM panel number, and FIRM effective date. Map images for unmapped and unmodernized areas cannot be used for regulatory purposes.

Appendix 5

Most Significant Groundwater Recharge Areas Map

MOST SIGNIFICANT GROUND-WATER RECHARGE AREAS OF GEORGIA

Harriet H. Davis, Jane C. Goodrich, Robert H. Hutchinson, and Deborah L. Waples

Geological Survey of Georgia
200 North Central Avenue
Atlanta, Georgia 30334
404/526-6000
www.dnr.state.ga.us

RECHARGE AREAS FOR:

COASTAL PLAIN PROVINCE

MIOCENE-PALEOGENE RECHARGE

UNCONFINED AQUIFERS

FLUVIDIALECTONIAN AQUIFER SYSTEM

CLAYBANK AQUIFER SYSTEM

CLAYTON AQUIFER SYSTEM

CRETACEOUS TERTIARY AQUIFER SYSTEM

RIDGE AND VALLEY PROVINCE

UNCONFINED AQUIFERS

PEDIMENT PROVINCE

PROSPECT AREAS OF THICK BEDS

(may be significant recharge areas)

Scale 1:500,000
1 inch = 50 miles (approximately)

State Map Data
Source: U.S. Dept. of the Interior, Geological Survey, 1980
U.S. Dept. of the Interior, Geological Survey, 1980
Compiled and published by the U.S. Geological Survey
October 1980

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U.S. Geological Survey, Reston, Virginia 20192

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INTRODUCTION

This map shows the most significant natural groundwater recharge areas in Georgia. Recharge areas are defined as those areas in which water enters the ground and replenishes the aquifer. The map shows the location of these recharge areas and the geologic provinces in which they occur.

WHAT ARE RECHARGE AREAS?

Recharge is the process by which water enters the ground and replenishes the aquifer. Recharge areas are defined as those areas in which water enters the ground and replenishes the aquifer. The map shows the location of these recharge areas and the geologic provinces in which they occur.

VALLEY AND RIDGE GEOLOGIC PROVINCE

This province is characterized by alternating ridges and valleys. The ridges are composed of older, more resistant rock, while the valleys are composed of younger, more erodible rock. The map shows the location of these recharge areas and the geologic provinces in which they occur.

PEDIMENT AND BLUE RIDGE GEOLOGIC PROVINCES

The pediment province is characterized by a broad, flat area of eroded rock. The blue ridge province is characterized by a series of ridges and valleys. The map shows the location of these recharge areas and the geologic provinces in which they occur.

COASTAL PLAIN PROVINCE

This province is characterized by a broad, flat area of eroded rock. The map shows the location of these recharge areas and the geologic provinces in which they occur.

USE OF THIS MAP

This map was prepared for the Georgia Department of Natural Resources. It is intended to provide information on the location of groundwater recharge areas in Georgia. The map shows the location of these recharge areas and the geologic provinces in which they occur.

SELECTED REFERENCES

Goodrich, J.C., and Davis, H.H., 1980. Groundwater recharge areas in Georgia. *Georgia Department of Natural Resources, Bulletin 18*, 1 p.

ACKNOWLEDGMENTS

We thank the Georgia Department of Natural Resources for their support of this project. We also thank the following individuals for their assistance: [List of names]

Appendix 6

Protected Species/Critical Habitats

IPaC resource list

This report is an automatically generated list of species and other resources such as critical habitat (collectively referred to as *trust resources*) under the U.S. Fish and Wildlife Service's (USFWS) jurisdiction that are known or expected to be on or near the project area referenced below. The list may also include trust resources that occur outside of the project area, but that could potentially be directly or indirectly affected by activities in the project area. However, determining the likelihood and extent of effects a project may have on trust resources typically requires gathering additional site-specific (e.g., vegetation/species surveys) and project-specific (e.g., magnitude and timing of proposed activities) information.

Below is a summary of the project information you provided and contact information for the USFWS office(s) with jurisdiction in the defined project area. Please read the introduction to each section that follows (Endangered Species, Migratory Birds, USFWS Facilities, and NWI Wetlands) for additional information applicable to the trust resources addressed in that section.

Location

Clarke County, Georgia



Local office

Georgia Ecological Services Field Office

☎ (706) 613-9493

📅 (706) 613-6059

✉ gaes_assistance@fws.gov

355 East Hancock Avenue

Room 320

Athens, GA 30601-2523

Endangered species

This resource list is for informational purposes only and does not constitute an analysis of project level impacts.

The primary information used to generate this list is the known or expected range of each species. Additional areas of influence (AOI) for species are also considered. An AOI includes areas outside of the species range if the species could be indirectly affected by activities in that area (e.g., placing a dam upstream of a fish population even if that fish does not occur at the dam site, may indirectly impact the species by reducing or eliminating water flow downstream). Because species can move, and site conditions can change, the species on this list are not guaranteed to be found on or near the project area. To fully determine any potential effects to species, additional site-specific and project-specific information is often required.

Section 7 of the Endangered Species Act **requires** Federal agencies to "request of the Secretary information whether any species which is listed or proposed to be listed may be present in the area of such proposed action" for any project that is conducted, permitted, funded, or licensed by any Federal agency. A letter from the local office and a species list which fulfills this requirement can **only** be obtained by requesting an official species list from either the Regulatory Review section in IPaC (see directions below) or from the local field office directly.

For project evaluations that require USFWS concurrence/review, please return to the IPaC website and request an official species list by doing the following:

1. Draw the project location and click CONTINUE.
2. Click DEFINE PROJECT.
3. Log in (if directed to do so).
4. Provide a name and description for your project.
5. Click REQUEST SPECIES LIST.

Listed species¹ and their critical habitats are managed by the [Ecological Services Program](#) of the U.S. Fish and Wildlife Service (USFWS) and the fisheries division of the National Oceanic and Atmospheric Administration (NOAA Fisheries²).

Species and critical habitats under the sole responsibility of NOAA Fisheries are **not** shown on this list. Please contact [NOAA Fisheries](#) for [species under their jurisdiction](#).

1. Species listed under the Endangered Species Act are threatened or endangered; IPaC also shows species that are candidates, or proposed, for listing. See the [listing status page](#) for more information. IPaC only shows species that are regulated by USFWS (see FAQ).
2. [NOAA Fisheries](#), also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

The following species are potentially affected by activities in this location:

Mammals

NAME	STATUS
Gray Bat <i>Myotis grisescens</i> Wherever found No critical habitat has been designated for this species. https://ecos.fws.gov/ecp/species/6329	Endangered
Tricolored Bat <i>Perimyotis subflavus</i> Wherever found No critical habitat has been designated for this species. https://ecos.fws.gov/ecp/species/10515	Proposed Endangered

Insects

NAME	STATUS
Monarch Butterfly <i>Danaus plexippus</i> Wherever found There is proposed critical habitat for this species. Your location does not overlap the critical habitat. https://ecos.fws.gov/ecp/species/9743	Proposed Threatened

Critical habitats

Potential effects to critical habitat(s) in this location must be analyzed along with the endangered species themselves.

There are no critical habitats at this location.

You are still required to determine if your project(s) may have effects on all above listed species.

Bald & Golden Eagles

Bald and Golden Eagles are protected under the Bald and Golden Eagle Protection Act ² and the Migratory Bird Treaty Act (MBTA) ¹. Any person or organization who plans or conducts activities that may result in impacts to Bald or Golden Eagles, or their habitats, should follow appropriate regulations and consider implementing appropriate avoidance and minimization measures, as described in the various links on this page.

Additional information can be found using the following links:

- Eagle Management <https://www.fws.gov/program/eagle-management>
- Measures for avoiding and minimizing impacts to birds <https://www.fws.gov/library/collections/avoiding-and-minimizing-incident-take-migratory-birds>
- Nationwide avoidance and minimization measures for birds <https://www.fws.gov/sites/default/files/documents/nationwide-standard-conservation-measures.pdf>
- Supplemental Information for Migratory Birds and Eagles in IPaC <https://www.fws.gov/media/supplemental-information-migratory-birds-and-bald-and-golden-eagles-may-occur-project-action>

There are Bald Eagles and/or Golden Eagles in your [project](#) area.

Measures for Proactively Minimizing Eagle Impacts

For information on how to best avoid and minimize disturbance to nesting bald eagles, please review the [National Bald Eagle Management Guidelines](#). You may employ the timing and activity-specific distance recommendations in this document when designing your project/activity to avoid and minimize eagle impacts. For bald eagle information specific to Alaska, please refer to [Bald Eagle Nesting and Sensitivity to Human Activity](#).

The FWS does not currently have guidelines for avoiding and minimizing disturbance to nesting Golden Eagles. For site-specific recommendations regarding nesting Golden Eagles, please consult with the appropriate Regional [Migratory Bird Office](#) or [Ecological Services Field Office](#).

If disturbance or take of eagles cannot be avoided, an [incidental take permit](#) may be available to authorize any take that results from, but is not the purpose of, an otherwise lawful activity. For assistance making this determination for Bald Eagles, visit the [Do I Need A Permit Tool](#). For assistance making this determination for golden eagles, please consult with the appropriate Regional [Migratory Bird Office](#) or [Ecological Services Field Office](#).

Ensure Your Eagle List is Accurate and Complete

If your project area is in a poorly surveyed area in IPaC, your list may not be complete and you may need to rely on other resources to determine what species may be present (e.g. your local FWS field office, state surveys, your own surveys). Please review the [Supplemental Information on Migratory Birds and Eagles](#), to help you properly interpret the report for your specified location, including determining if there is sufficient data to ensure your list is accurate.

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to bald or golden eagles on your list, see the "Probability of Presence Summary" below to see when these bald or golden eagles are most likely to be present and breeding in your project area.

Review the FAQs

The FAQs below provide important additional information and resources.

NAME	BREEDING SEASON
Bald Eagle <i>Haliaeetus leucocephalus</i> This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.	Breeds Sep 1 to Jul 31

Golden Eagle *Aquila chrysaetos*

Breeds elsewhere

This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.

<https://ecos.fws.gov/ecp/species/1680>

Probability of Presence Summary

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read "[Supplemental Information on Migratory Birds and Eagles](#)", specifically the FAQ section titled "Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

Probability of Presence (■)

Each green bar represents the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during a particular week of the year. (A year is represented as 12 4-week months.) A taller bar indicates a higher probability of species presence. The survey effort (see below) can be used to establish a level of confidence in the presence score. One can have higher confidence in the presence score if the corresponding survey effort is also high.

How is the probability of presence score calculated? The calculation is done in three steps:

1. The probability of presence for each week is calculated as the number of survey events in the week where the species was detected divided by the total number of survey events for that week. For example, if in week 12 there were 20 survey events and the Spotted Towhee was found in 5 of them, the probability of presence of the Spotted Towhee in week 12 is 0.25.
2. To properly present the pattern of presence across the year, the relative probability of presence is calculated. This is the probability of presence divided by the maximum probability of presence across all weeks. For example, imagine the probability of presence in week 20 for the Spotted Towhee is 0.05, and that the probability of presence at week 12 (0.25) is the maximum of any week of the year. The relative probability of presence on week 12 is $0.25/0.25 = 1$; at week 20 it is $0.05/0.25 = 0.2$.
3. The relative probability of presence calculated in the previous step undergoes a statistical conversion so that all possible values fall between 0 and 10, inclusive. This is the probability of presence score.

To see a bar's probability of presence score, simply hover your mouse cursor over the bar.

Breeding Season (■)

Yellow bars denote a very liberal estimate of the time-frame inside which the bird breeds across its entire range. If there are no yellow bars shown for a bird, it does not breed in your project area.

Survey Effort (|)

Vertical black lines superimposed on probability of presence bars indicate the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps. The number of surveys is expressed as a range, for example, 33 to 64 surveys.

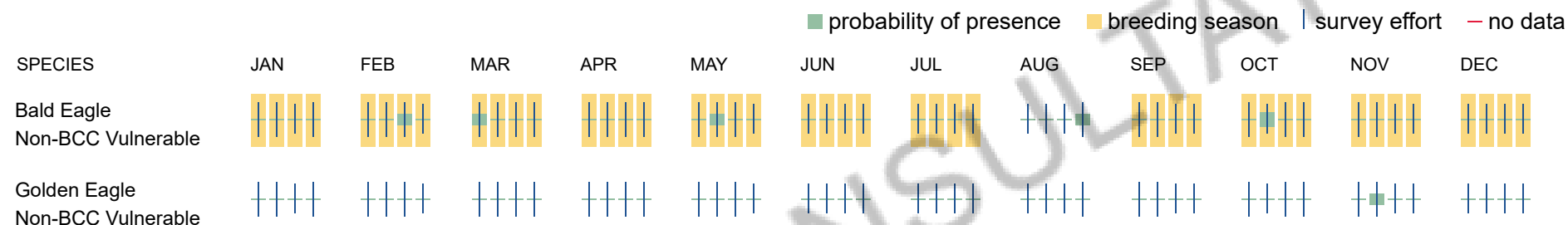
To see a bar's survey effort range, simply hover your mouse cursor over the bar.

No Data (—)

A week is marked as having no data if there were no survey events for that week.

Survey Timeframe

Surveys from only the last 10 years are used in order to ensure delivery of currently relevant information. The exception to this is areas off the Atlantic coast, where bird returns are based on all years of available data, since data in these areas is currently much more sparse.



Bald & Golden Eagles FAQs

What does IPaC use to generate the potential presence of bald and golden eagles in my specified location?

The potential for eagle presence is derived from data provided by the [Avian Knowledge Network \(AKN\)](#). The AKN data is based on a growing collection of [survey, banding, and citizen science datasets](#) and is queried and filtered to return a list of those birds reported as occurring in the 10km grid cell(s) which your project intersects, and that have been identified as warranting special attention because they are an eagle ([Bald and Golden Eagle Protection Act](#) requirements may apply).

Proper interpretation and use of your eagle report

On the graphs provided, please look carefully at the survey effort (indicated by the black vertical line) and for the existence of the "no data" indicator (a red horizontal line). A high survey effort is the key component. If the survey effort is high, then the probability of presence score can be viewed as more dependable. In contrast, a low survey effort line or no data line (red horizontal) means a lack of data and, therefore, a lack of certainty about presence of the species. This list is not perfect; it is simply a starting point for identifying what birds have the potential to be in your project area, when they might be there, and if they might be breeding (which means nests might be present). The list and associated information help you know what to look for to confirm presence and helps guide you in knowing when to implement avoidance and minimization measures to eliminate or reduce potential impacts from your project activities or get the appropriate permits should presence be confirmed.

How do I know if eagles are breeding, wintering, or migrating in my area?

To see what part of a particular bird's range your project area falls within (i.e. breeding, wintering, migrating, or resident), you may query your location using the [RAIL Tool](#) and view the range maps provided for birds in your area at the bottom of the profiles provided for each bird in your results. If an eagle on your IPaC migratory bird species list has a breeding season associated with it (indicated by yellow vertical bars on the phenology graph in your "IPaC PROBABILITY OF PRESENCE SUMMARY" at the top of your results list), there may be nests present at some point within the timeframe specified. If "Breeds elsewhere" is indicated, then the bird likely does not breed in your project area.

Interpreting the Probability of Presence Graphs

Each green bar represents the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during a particular week of the year. A taller bar indicates a higher probability of species presence. The survey effort can be used to establish a level of confidence in the presence score.

How is the probability of presence score calculated? The calculation is done in three steps:

The probability of presence for each week is calculated as the number of survey events in the week where the species was detected divided by the total number of survey events for that week. For example, if in week 12 there were 20 survey events and the Spotted Towhee was found in 5 of them, the probability of presence of the Spotted Towhee in week 12 is 0.25.

To properly present the pattern of presence across the year, the relative probability of presence is calculated. This is the probability of presence divided by the maximum probability of presence across all weeks. For example, imagine the probability of presence in week 20 for the Spotted Towhee is 0.05, and that the probability of presence at week 12 (0.25) is the maximum of any week of the year. The relative probability of presence on week 12 is $0.25/0.25 = 1$; at week 20 it is $0.05/0.25 = 0.2$.

The relative probability of presence calculated in the previous step undergoes a statistical conversion so that all possible values fall between 0 and 10, inclusive. This is the probability of presence score.

Breeding Season ()

Yellow bars denote a very liberal estimate of the time-frame inside which the bird breeds across its entire range. If there are no yellow bars shown for a bird, it does not breed in your project area.

Survey Effort ()

Vertical black lines superimposed on probability of presence bars indicate the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps.

No Data ()

A week is marked as having no data if there were no survey events for that week.

Survey Timeframe

Surveys from only the last 10 years are used in order to ensure delivery of currently relevant information. The exception to this is areas off the Atlantic coast, where bird returns are based on all years of available data, since data in these areas is currently much more sparse.

Migratory birds

The Migratory Bird Treaty Act (MBTA) ¹ prohibits the take (including killing, capturing, selling, trading, and transport) of protected migratory bird species without prior authorization by the Department of Interior U.S. Fish and Wildlife Service (Service).

1. The [Migratory Birds Treaty Act](#) of 1918.
2. The [Bald and Golden Eagle Protection Act](#) of 1940.

Additional information can be found using the following links:

- Eagle Management <https://www.fws.gov/program/eagle-management>
- Measures for avoiding and minimizing impacts to birds <https://www.fws.gov/library/collections/avoiding-and-minimizing-incident-take-migratory-birds>
- Nationwide avoidance and minimization measures for birds
- Supplemental Information for Migratory Birds and Eagles in IPaC <https://www.fws.gov/media/supplemental-information-migratory-birds-and-bald-and-golden-eagles-may-occur-project-action>

Measures for Proactively Minimizing Migratory Bird Impacts

Your IPaC Migratory Bird list showcases [birds of concern](#), including [Birds of Conservation Concern \(BCC\)](#), in your project location. This is not a comprehensive list of all birds found in your project area. However, you can help proactively minimize significant impacts to all birds at your project location by implementing the measures in the [Nationwide avoidance and minimization measures for birds](#) document, and any other project-specific avoidance and minimization measures suggested at the link [Measures for avoiding and minimizing impacts to birds](#) for the birds of concern on your list below.

Ensure Your Migratory Bird List is Accurate and Complete

If your project area is in a poorly surveyed area, your list may not be complete and you may need to rely on other resources to determine what species may be present (e.g. your local FWS field office, state surveys, your own surveys). Please review the [Supplemental Information on Migratory Birds and Eagles document](#), to help you properly interpret the report for your specified location, including determining if there is sufficient data to ensure your list is accurate.

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to migratory birds on your list, see the "Probability of Presence Summary" below to see when these birds are most likely to be present and breeding in your project area.

Review the FAQs

The FAQs below provide important additional information and resources.

NAME	BREEDING SEASON
Bald Eagle <i>Haliaeetus leucocephalus</i> This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.	Breeds Sep 1 to Jul 31
Black-billed Cuckoo <i>Coccyzus erythrophthalmus</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9399	Breeds May 15 to Oct 10
Cerulean Warbler <i>Setophaga cerulea</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/2974	Breeds Apr 28 to Jul 20
Chimney Swift <i>Chaetura pelagica</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds Mar 15 to Aug 25

Chuck-will's-widow *Antrostomus carolinensis*

Breeds May 10 to Jul 10

This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA

Eastern Whip-poor-will *Antrostomus vociferus*

Breeds May 1 to Aug 20

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

Golden Eagle *Aquila chrysaetos*

Breeds elsewhere

This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.

<https://ecos.fws.gov/ecp/species/1680>

Grasshopper Sparrow *Ammodramus savannarum perpallidus*

Breeds Jun 1 to Aug 20

This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA

<https://ecos.fws.gov/ecp/species/8329>

Kentucky Warbler *Geothlypis formosa*

Breeds Apr 20 to Aug 20

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

Prairie Warbler *Setophaga discolor*

Breeds May 1 to Jul 31

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

Prothonotary Warbler *Protonotaria citrea*

Breeds Apr 1 to Jul 31

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

Red-headed Woodpecker *Melanerpes erythrocephalus*

Breeds May 10 to Sep 10

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

Rusty Blackbird *Euphagus carolinus*

Breeds elsewhere

This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA

Wood Thrush *Hylocichla mustelina*

Breeds May 10 to Aug 31

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

Probability of Presence Summary

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read "[Supplemental Information on Migratory Birds and Eagles](#)", specifically the FAQ section titled "Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

Probability of Presence (■)

Each green bar represents the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during a particular week of the year. (A year is represented as 12 4-week months.) A taller bar indicates a higher probability of species presence. The survey effort (see below) can be used to establish a level of confidence in the presence score. One can have higher confidence in the presence score if the corresponding survey effort is also high.

How is the probability of presence score calculated? The calculation is done in three steps:

1. The probability of presence for each week is calculated as the number of survey events in the week where the species was detected divided by the total number of survey events for that week. For example, if in week 12 there were 20 survey events and the Spotted Towhee was found in 5 of them, the probability of presence of the Spotted Towhee in week 12 is 0.25.
2. To properly present the pattern of presence across the year, the relative probability of presence is calculated. This is the probability of presence divided by the maximum probability of presence across all weeks. For example, imagine the probability of

presence in week 20 for the Spotted Towhee is 0.05, and that the probability of presence at week 12 (0.25) is the maximum of any week of the year. The relative probability of presence on week 12 is $0.25/0.25 = 1$; at week 20 it is $0.05/0.25 = 0.2$.

- The relative probability of presence calculated in the previous step undergoes a statistical conversion so that all possible values fall between 0 and 10, inclusive. This is the probability of presence score.

To see a bar's probability of presence score, simply hover your mouse cursor over the bar.

Breeding Season (■)

Yellow bars denote a very liberal estimate of the time-frame inside which the bird breeds across its entire range. If there are no yellow bars shown for a bird, it does not breed in your project area.

Survey Effort (|)

Vertical black lines superimposed on probability of presence bars indicate the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps. The number of surveys is expressed as a range, for example, 33 to 64 surveys.

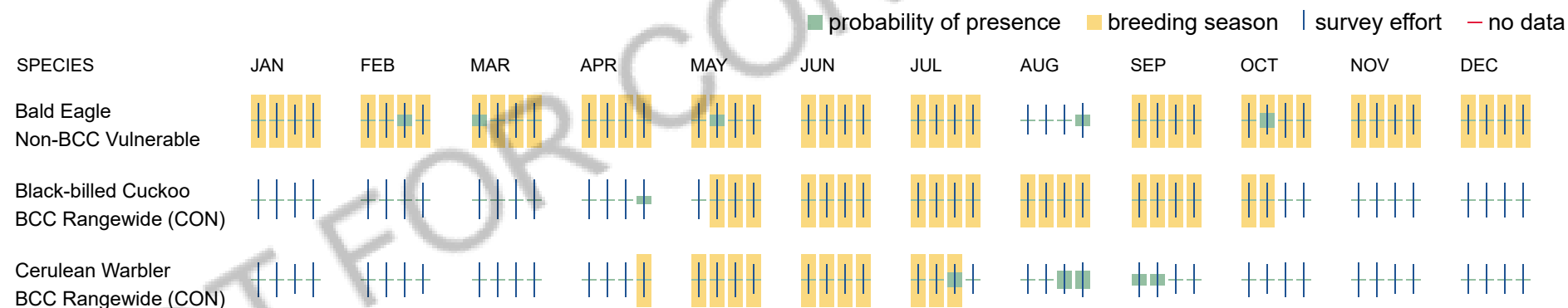
To see a bar's survey effort range, simply hover your mouse cursor over the bar.

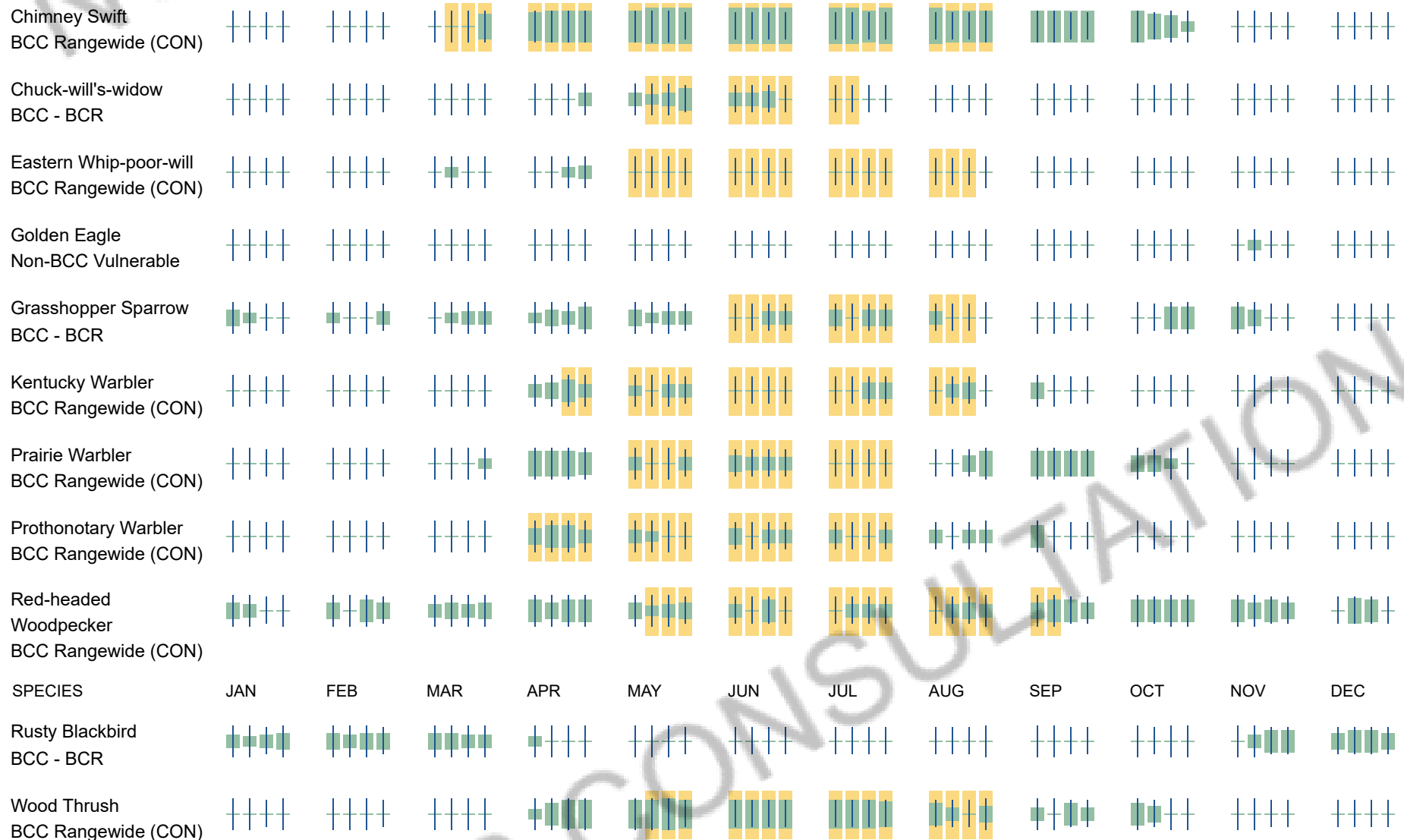
No Data (—)

A week is marked as having no data if there were no survey events for that week.

Survey Timeframe

Surveys from only the last 10 years are used in order to ensure delivery of currently relevant information. The exception to this is areas off the Atlantic coast, where bird returns are based on all years of available data, since data in these areas is currently much more sparse.





Migratory Bird FAQs

Tell me more about avoidance and minimization measures I can implement to avoid or minimize impacts to migratory birds.

[Nationwide Avoidance & Minimization Measures for Birds](#) describes measures that can help avoid and minimize impacts to all birds at any location year-round. When birds may be breeding in the area, identifying the locations of any active nests and avoiding their destruction is one of the most effective ways to minimize impacts. To see when birds are most likely to occur and breed in your project area, view the Probability of Presence Summary.

[Additional measures](#) or [permits](#) may be advisable depending on the type of activity you are conducting and the type of infrastructure or bird species present on your project site.

What does IPaC use to generate the list of migratory birds that potentially occur in my specified location?

The Migratory Bird Resource List is comprised of [Birds of Conservation Concern \(BCC\)](#) and other species that may warrant special attention in your project location, such as those listed under the Endangered Species Act or the [Bald and Golden Eagle Protection Act](#) and those species marked as "Vulnerable". See the FAQ "What are the levels of concern for migratory birds?" for more information on the levels of concern covered in the IPaC migratory bird species list.

The migratory bird list generated for your project is derived from data provided by the [Avian Knowledge Network \(AKN\)](#). The AKN data is based on a growing collection of [survey, banding, and citizen science datasets](#) and is queried and filtered to return a list of those birds reported as occurring in the 10km grid cell(s) with which your project intersects. These species have been identified as warranting special attention because they are BCC species in that area, an eagle ([Bald and Golden Eagle Protection Act](#) requirements may apply), or a species that has a particular vulnerability to offshore activities or development.

Again, the Migratory Bird Resource list includes only a subset of birds that may occur in your project area. It is not representative of all birds that may occur in your project area. To get a list of all birds potentially present in your project area, and to verify survey effort when no results present, please visit the [Rapid Avian Information Locator \(RAIL\) Tool](#).

Why are subspecies showing up on my list?

Subspecies profiles are included on the list of species present in your project area because observations in the AKN for **the species** are being detected. If the species are present, that means that the subspecies may also be present. If a subspecies shows up on your list, you may need to rely on other resources to determine if that subspecies may be present (e.g. your local FWS field office, state surveys, your own surveys).

What does IPaC use to generate the probability of presence graphs for the migratory birds potentially occurring in my specified location?

The probability of presence graphs associated with your migratory bird list are based on data provided by the [Avian Knowledge Network \(AKN\)](#). This data is derived from a growing collection of [survey, banding, and citizen science datasets](#).

Probability of presence data is continuously being updated as new and better information becomes available. To learn more about how the probability of presence graphs are produced and how to interpret them, go to the Probability of Presence Summary and then click on the "Tell me about these graphs" link.

How do I know if a bird is breeding, wintering, or migrating in my area?

To see what part of a particular bird's range your project area falls within (i.e. breeding, wintering, migrating, or resident), you may query your location using the [RAIL Tool](#) and view the range maps provided for birds in your area at the bottom of the profiles provided for each bird in your results. If a bird on your IPaC migratory bird species list has a breeding season associated with it (indicated by yellow vertical bars on the phenology graph in your "IPaC PROBABILITY OF PRESENCE SUMMARY" at the top of your results list), there may be nests present at some point within the timeframe specified. If "Breeds elsewhere" is indicated, then the bird likely does not breed in your project area.

What are the levels of concern for migratory birds?

Migratory birds delivered through IPaC fall into the following distinct categories of concern:

1. "BCC Rangewide" birds are [Birds of Conservation Concern](#) (BCC) that are of concern throughout their range anywhere within the USA (including Hawaii, the Pacific Islands, Puerto Rico, and the Virgin Islands);
2. "BCC - BCR" birds are BCCs that are of concern only in particular Bird Conservation Regions (BCRs) in the continental USA; and
3. "Non-BCC - Vulnerable" birds are not BCC species in your project area, but appear on your list either because of the [Bald and Golden Eagle Protection Act](#) requirements (for eagles) or (for non-eagles) potential susceptibilities in offshore areas from certain types of development or activities (e.g. offshore energy development or longline fishing).

Although it is important to avoid and minimize impacts to all birds, efforts should be made, in particular, to avoid and minimize impacts to the birds on this list, especially BCC species. For more information on avoidance and minimization measures you can implement to help avoid and minimize migratory bird impacts, please see the FAQ "Tell me more about avoidance and minimization measures I can implement to avoid or minimize impacts to migratory birds".

Details about birds that are potentially affected by offshore projects

For additional details about the relative occurrence and abundance of both individual bird species and groups of bird species within your project area off the Atlantic Coast, please visit the [Northeast Ocean Data Portal](#). The Portal also offers data and information about other taxa besides birds that may be helpful to you in your project review. Alternately, you may download the bird model results files underlying the portal maps through the [NOAA NCCOS Integrative Statistical Modeling and Predictive Mapping of Marine Bird Distributions and Abundance on the Atlantic Outer Continental Shelf](#) project webpage.

Proper interpretation and use of your migratory bird report

The migratory bird list generated is not a list of all birds in your project area, only a subset of birds of priority concern. To learn more about how your list is generated and see options for identifying what other birds may be in your project area, please see the FAQ "What does IPaC use to generate the migratory birds potentially occurring in my specified location". Please be aware this report provides the "probability of presence" of birds within the 10 km grid cell(s) that overlap your project; not your exact project footprint. On the graphs provided, please look carefully at the survey effort (indicated by the black vertical line) and for the existence of the "no data" indicator (a red horizontal line). A high survey effort is the key component. If the survey effort is high, then the probability of presence score can be viewed as more dependable. In contrast, a low survey effort bar or no data bar means a lack of data and, therefore, a lack of certainty about presence of the species. This list does not represent all birds present in your project area. It is simply a

starting point for identifying what birds of concern have the potential to be in your project area, when they might be there, and if they might be breeding (which means nests might be present). The list and associated information help you know what to look for to confirm presence and helps guide implementation of avoidance and minimization measures to eliminate or reduce potential impacts from your project activities, should presence be confirmed. To learn more about avoidance and minimization measures, visit the FAQ "Tell me about avoidance and minimization measures I can implement to avoid or minimize impacts to migratory birds".

Interpreting the Probability of Presence Graphs

Each green bar represents the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during a particular week of the year. A taller bar indicates a higher probability of species presence. The survey effort can be used to establish a level of confidence in the presence score.

How is the probability of presence score calculated? The calculation is done in three steps:

The probability of presence for each week is calculated as the number of survey events in the week where the species was detected divided by the total number of survey events for that week. For example, if in week 12 there were 20 survey events and the Spotted Towhee was found in 5 of them, the probability of presence of the Spotted Towhee in week 12 is 0.25.

To properly present the pattern of presence across the year, the relative probability of presence is calculated. This is the probability of presence divided by the maximum probability of presence across all weeks. For example, imagine the probability of presence in week 20 for the Spotted Towhee is 0.05, and that the probability of presence at week 12 (0.25) is the maximum of any week of the year. The relative probability of presence on week 12 is $0.25/0.25 = 1$; at week 20 it is $0.05/0.25 = 0.2$.

The relative probability of presence calculated in the previous step undergoes a statistical conversion so that all possible values fall between 0 and 10, inclusive. This is the probability of presence score.

Breeding Season ()

Yellow bars denote a very liberal estimate of the time-frame inside which the bird breeds across its entire range. If there are no yellow bars shown for a bird, it does not breed in your project area.

Survey Effort ()

Vertical black lines superimposed on probability of presence bars indicate the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps.

No Data ()

A week is marked as having no data if there were no survey events for that week.

Survey Timeframe

Surveys from only the last 10 years are used in order to ensure delivery of currently relevant information. The exception to this is areas off the Atlantic coast, where bird returns are based on all years of available data, since data in these areas is currently much more sparse.

Facilities

National Wildlife Refuge lands

Any activity proposed on lands managed by the [National Wildlife Refuge](#) system must undergo a 'Compatibility Determination' conducted by the Refuge. Please contact the individual Refuges to discuss any questions or concerns.

There are no refuge lands at this location.

Fish hatcheries

There are no fish hatcheries at this location.

Wetlands in the National Wetlands Inventory (NWI)

Impacts to [NWI wetlands](#) and other aquatic habitats may be subject to regulation under Section 404 of the Clean Water Act, or other State/Federal statutes.

For more information please contact the Regulatory Program of the local [U.S. Army Corps of Engineers District](#).

Please note that the NWI data being shown may be out of date. We are currently working to update our NWI data set. We recommend you verify these results with a site visit to determine the actual extent of wetlands on site.

This location overlaps the following wetlands:

RIVERINE

[R4SBC](#)

A full description for each wetland code can be found at the [National Wetlands Inventory website](#)

NOTE: This initial screening does **not** replace an on-site delineation to determine whether wetlands occur. Additional information on the NWI data is provided below.

Data limitations

The Service's objective of mapping wetlands and deepwater habitats is to produce reconnaissance level information on the location, type and size of these resources. The maps are prepared from the analysis of high altitude imagery. Wetlands are identified based on vegetation, visible hydrology and geography. A margin of error is inherent in the use of imagery; thus, detailed on-the-ground inspection of any particular site may result in revision of the wetland boundaries or classification established through image analysis.

The accuracy of image interpretation depends on the quality of the imagery, the experience of the image analysts, the amount and quality of the collateral data and the amount of ground truth verification work conducted. Metadata should be consulted to determine the date of the source imagery used and any mapping problems.

Wetlands or other mapped features may have changed since the date of the imagery or field work. There may be occasional differences in polygon boundaries or classifications between the information depicted on the map and the actual conditions on site.

Data exclusions

Certain wetland habitats are excluded from the National mapping program because of the limitations of aerial imagery as the primary data source used to detect wetlands. These habitats include seagrasses or submerged aquatic vegetation that are found in the intertidal and subtidal zones of estuaries and nearshore coastal waters. Some deepwater reef communities (coral or tubercid worm reefs) have also been excluded from the inventory. These habitats, because of their depth, go undetected by aerial imagery.

Data precautions

Federal, state, and local regulatory agencies with jurisdiction over wetlands may define and describe wetlands in a different manner than that used in this inventory. There is no attempt, in either the design or products of this inventory, to define the limits of proprietary jurisdiction of any Federal, state, or local government or to establish the geographical scope of the regulatory programs of government agencies. Persons intending to engage in activities involving modifications within or adjacent to wetland areas should seek the advice of appropriate Federal, state, or local agencies concerning specified agency regulatory programs and proprietary jurisdictions that may affect such activities.

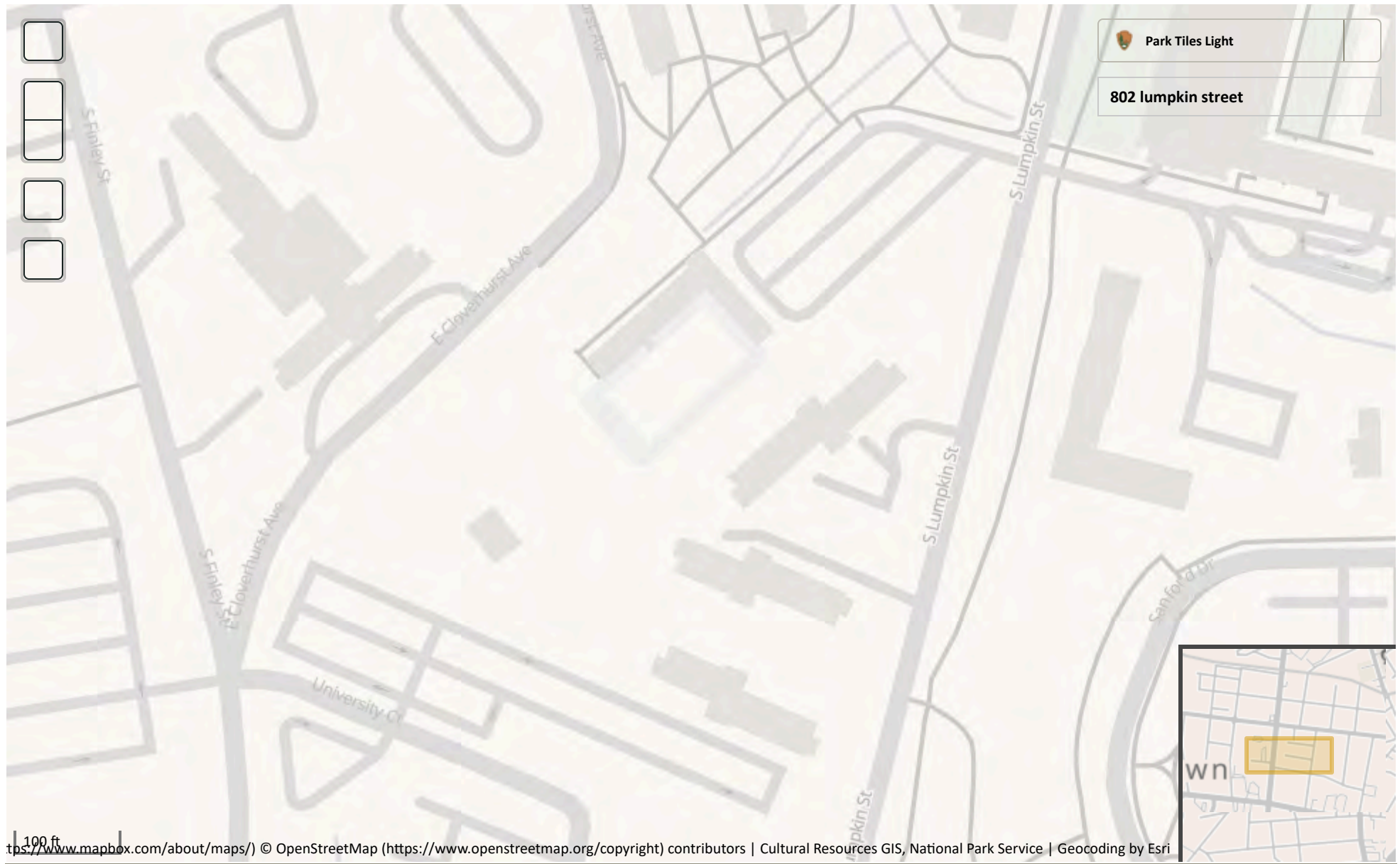
Appendix 7

National Register of Historic Places
Historic Resource Study

National Register of Historic Places

National Park Service
U.S. Department of the Interior

Public, non-restricted data depicting National Register spatial data processed by the Cultural Resources GIS facility. ...





UNIVERSITY OF GEORGIA

Historic Resource Study: Legion Pool Complex at the University of Georgia

Athens, Clarke County, Georgia



June 2025

Prepared for:

The University of Georgia
Office of University Architects for Facilities Planning

Historic Resource Study: Legion Pool Complex at the University of Georgia

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Prepared for:

The University of Georgia
Office of University Architects for Facilities Planning

Prepared by:

A handwritten signature in black ink, reading "F. Patricia Stallings". The signature is written in a cursive, flowing style.

Patricia Stallings
Senior Historian

Brockington and Associates, Inc.
Atlanta • Charleston • Savannah

Executive Summary

In April 2025, the University of Georgia (UGA) Office of University Architects for Facilities Planning contracted Brockington and Associates, Inc. (Brockington) to conduct a Historic Resource Study (HRS) of Legion Pool, associated buildings (UGA Buildings #2605 and 2638), and Legion Field. The complex is located at 802 South Lumpkin Street in the northern portion of the UGA campus in Athens, Clarke County, Georgia. The HRS is designed to help the University fulfill its goals to identify, evaluate, and document historic resources on its campuses and other properties. This documentation is being prepared as a due diligence effort to support the ongoing and future management of the complex. Project activities included archival research, a site visit to inspect the architectural features of the complex, high-resolution digital photography, evaluation of the features, and report preparation.

Legion Pool, its bathhouse, and Legion Field were part of a recreational complex first envisioned by the Athens American Legion post during the early 1930s. Completed between 1935 and 1936, the pool complex was funded through a cooperative effort between the American Legion, the City of Athens, and local citizens as well as New Deal monies obtained through the Works Progress Administration (WPA). The pool was transferred to UGA in the 1950s, but it continued as a public recreational asset even after the City of Athens ceded management in the mid-1970s. The associated Legion Field, which was always used for recreational purposes, also gained popularity with the UGA student body during the 1970s when it was frequently used for sponsored musical and other events. The bathhouse (Building #2605), completed in 1936, was designed by local architect C. Wilmer Henry and reflected the Colonial Revival style of architecture.

The Georgia State Historic Preservation Office (SHPO) previously determined that Legion Pool and its associated “Service Building” (i.e., the bathhouse) were eligible for the National Register of Historic Places (NRHP). Archival research conducted for the project confirmed that the Legion Pool complex possesses significant associations under Criterion A (*events*) at the local level in the areas of recreation, entertainment, and social history. Under Criterion C (*architecture*), while the pool and its bathhouse have lost some degree of integrity in terms of material changes, collectively they retain sufficient architectural integrity to express their period and type of construction. The bathhouse retains certain key features, including the brick cladding, the overall one-story linear form, most of its gabled roofline, the recessed entry, the rear wall brick detailing, and the perpendicular, open pavilion. Legion Pool retains its overall dimensions (width, length, and depth) and spatial relationship with the bathhouse and the pavilion. Legion Field still reflects the defining open space that was used by the public as part of the recreational grounds, as well as by the student body for concerts and football events. The non-historic concert stand, built in 1983, is not considered a contributing element, nor are certain non-historic landscape elements around the field, including the sidewalk and the stone wall.

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1.0 Project Overview

On April 23, 2025, Brockington and Associates, Inc. (Brockington) conducted a Historic Resource Study (HRS) of the c1935 Legion Pool, its associated buildings (UGA Buildings #2605 and 2638), and Legion Field at the University of Georgia (UGA). The complex is located at 802 South Lumpkin Street, in the northern portion of the UGA campus in Athens, Clarke County, Georgia (Figures 1.1 through 1.8). The HRS is designed to help the University fulfill its goals to identify, evaluate, and document historic resources on its campuses and other properties.

The site visit consisted of physically inspecting the exterior and interior of the pool building, the pool itself, and the surrounding landscape, which also includes Legion Field, and a non-historic concert stand. High-resolution digital photographs were taken of the buildings, and notes were made as to materials, design, and any obvious physical alterations. Our archival research began with a review of the digitized collection of the campus newspaper, *The Red and Black*, which includes searchable copies dating to the late nineteenth century. We also reviewed materials at UGA's Hargrett Rare Book and Manuscript Library, including campus plans, annuals, newspaper clippings, historic photographs, and additional campus publications. Collections at the Athens-Clarke County Library were reviewed, as well as architectural plans available through the UGA Facilities Management Division Facilities Inventory.

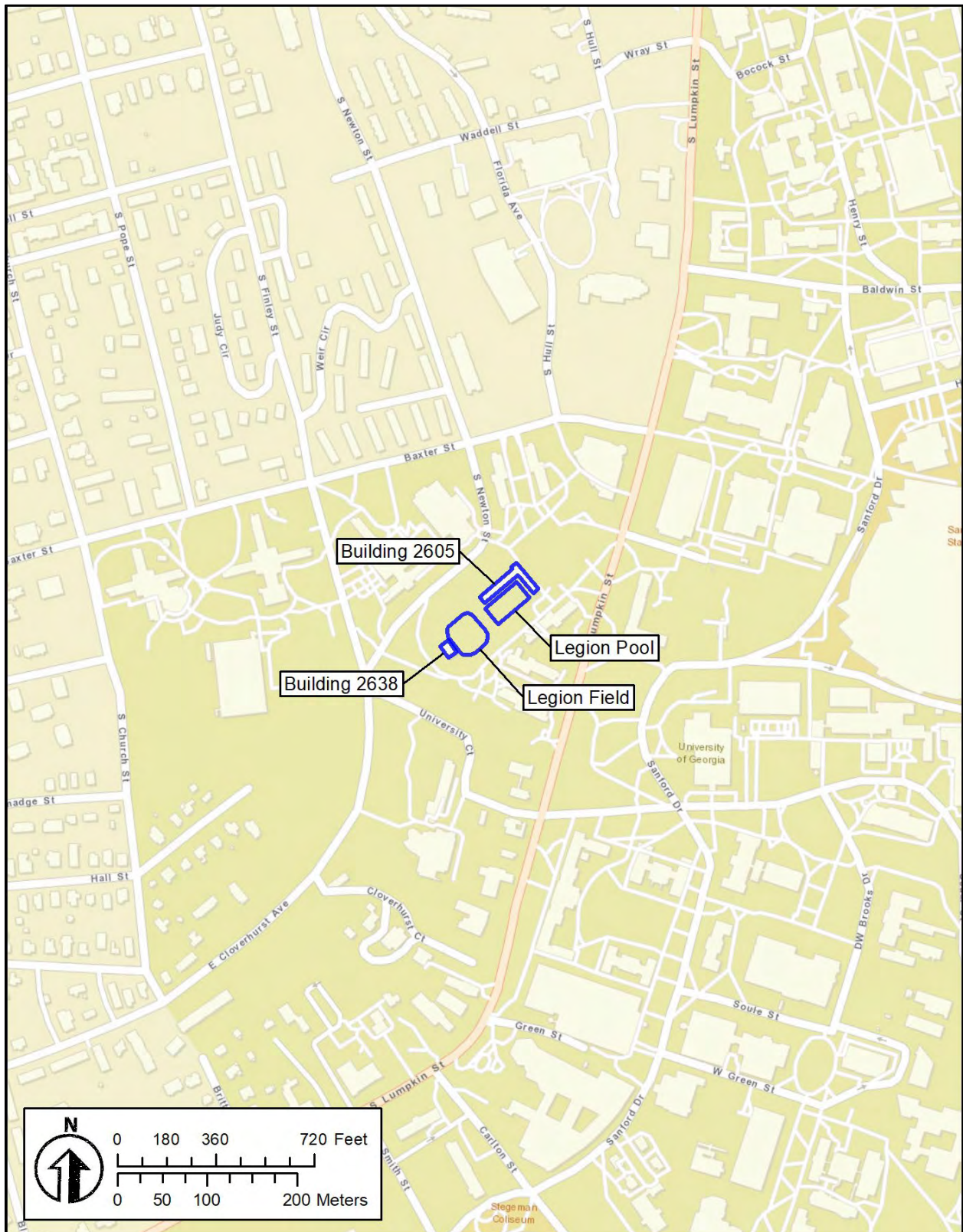


Figure 1.1 Location of Legion Pool and associated buildings.

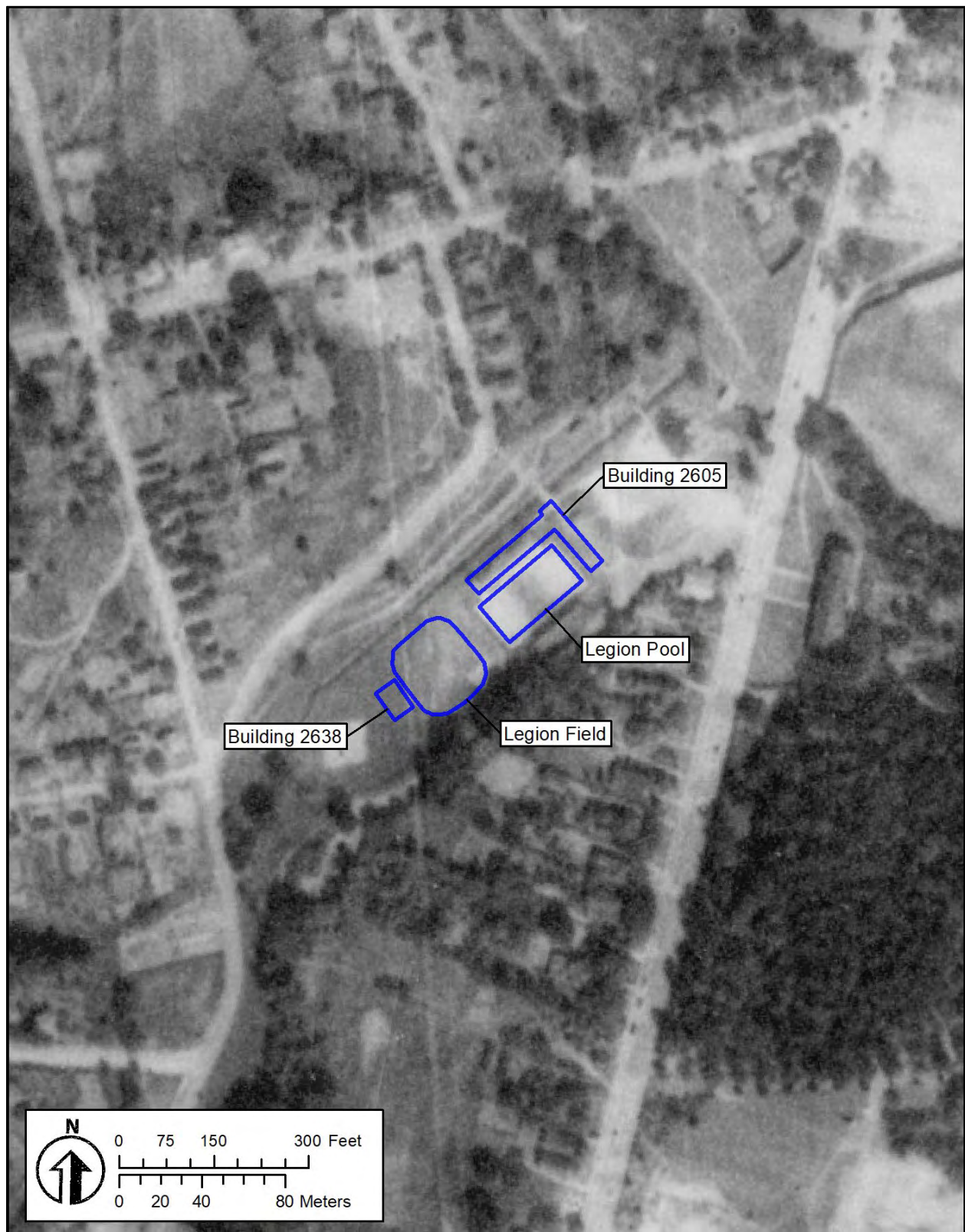


Figure 1.2 Legion Pool and associated resources on a 1938 aerial map. Note: aerial shows future location of Building 2638.

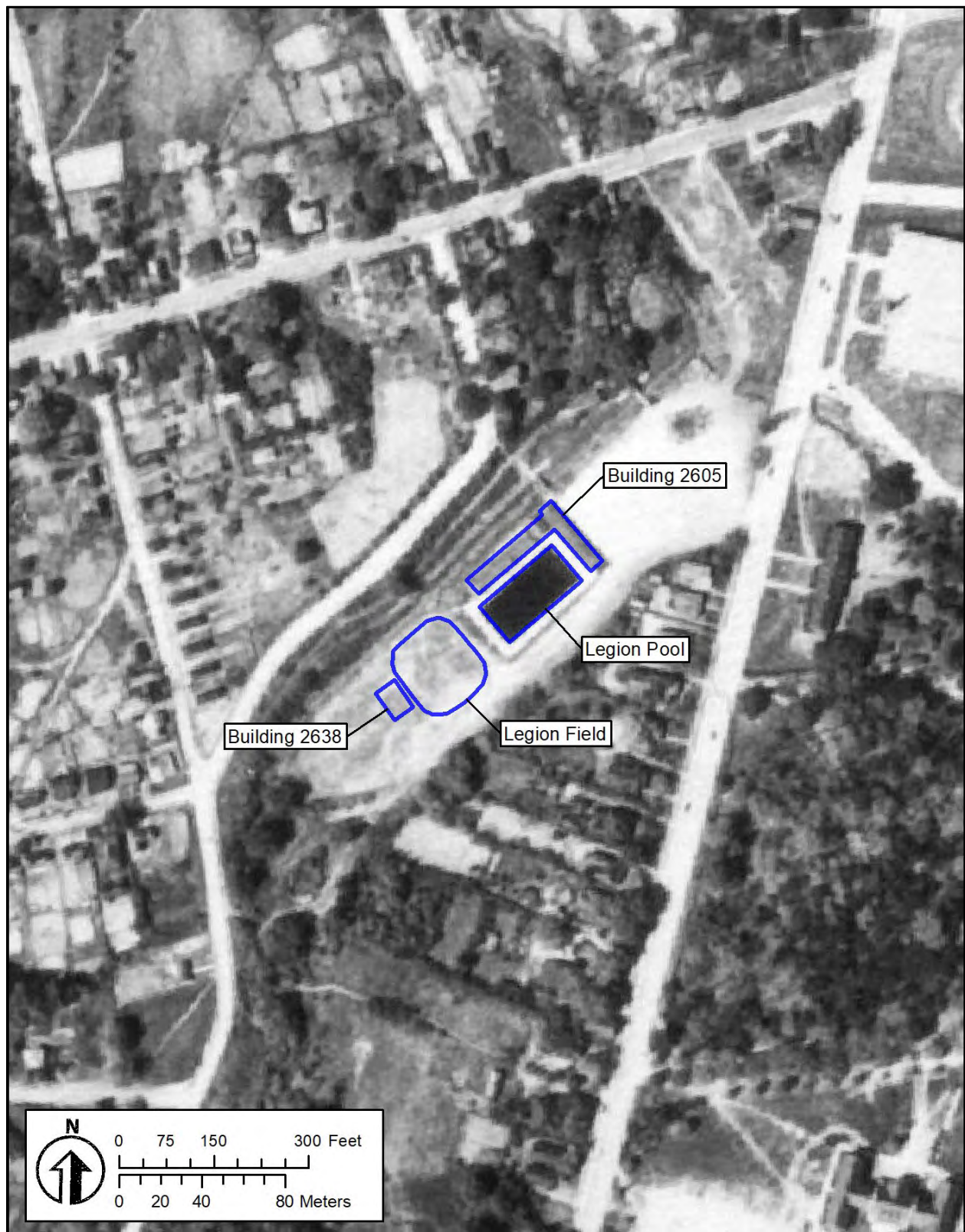


Figure 1.3 Legion Pool and associated resources on a 1944 aerial map. Note: aerial shows future location of Building 2638.

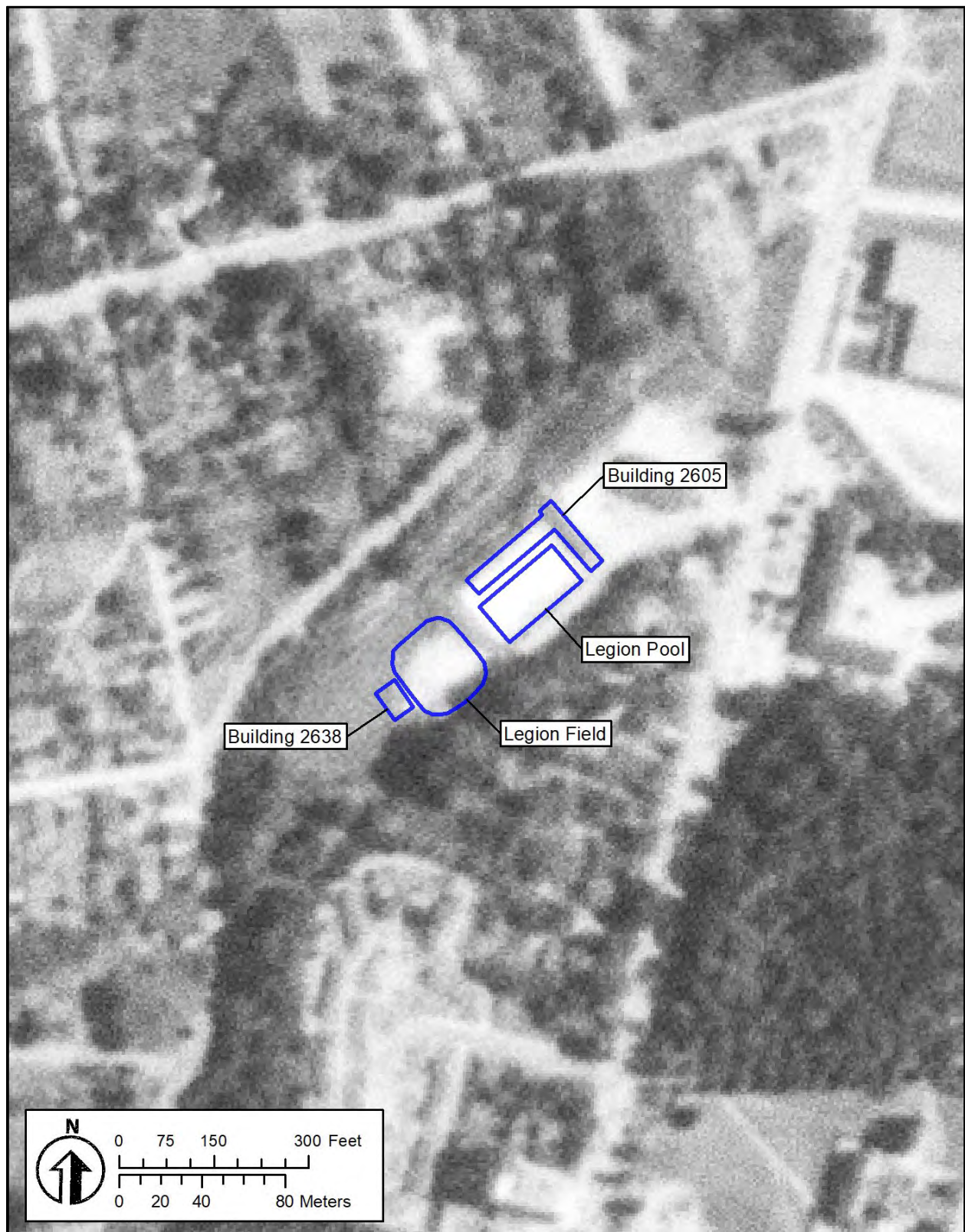


Figure 1.4 Legion Pool and associated resources on a 1951 aerial map. Note: aerial shows future location of Building 2638.

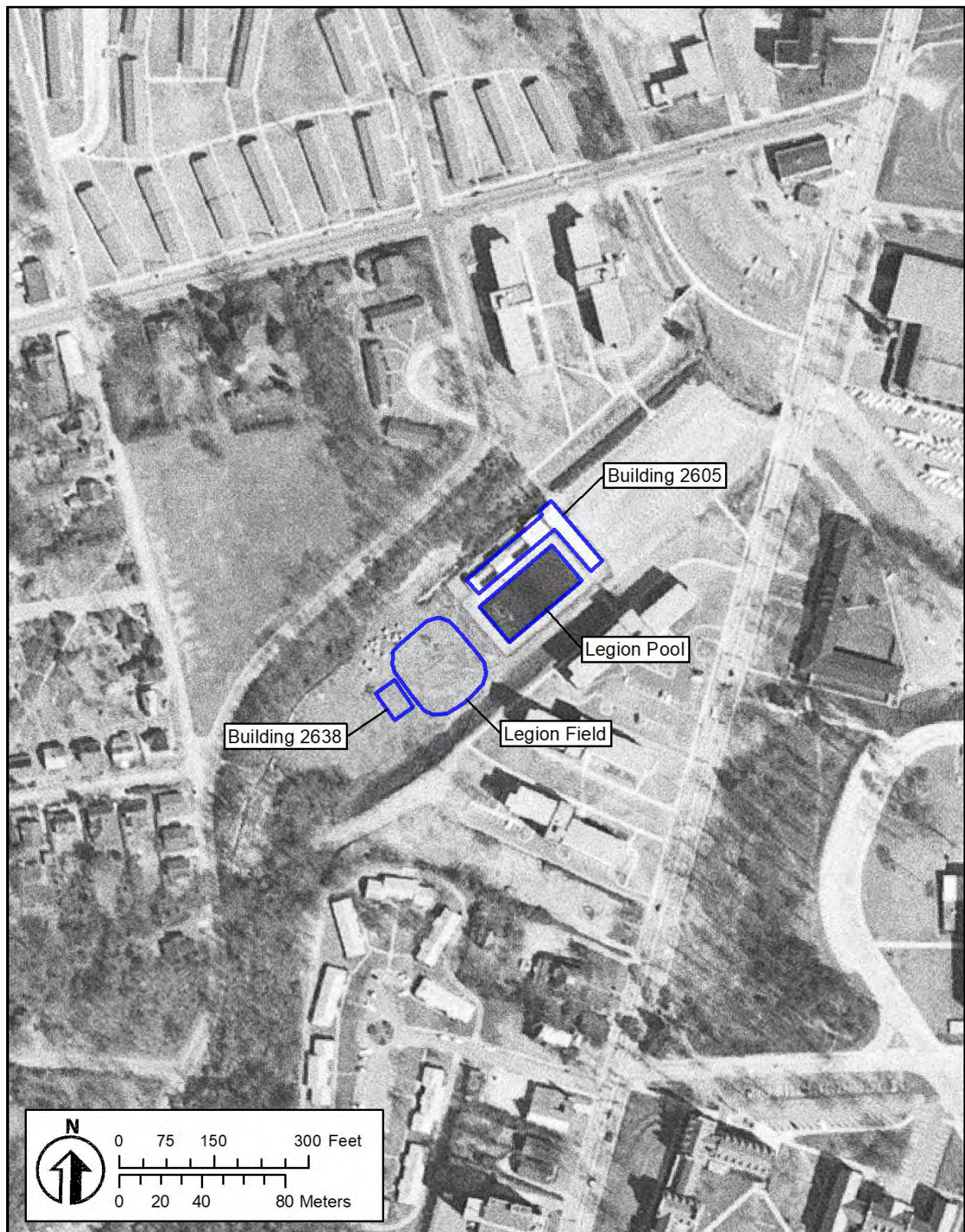


Figure 1.5 Legion Pool and associated resources on a 1962 aerial map. Note: aerial shows future location of Building 2638. Also, by this time, the old Legion log cabin, northeast of the bathhouse, had been demolished.

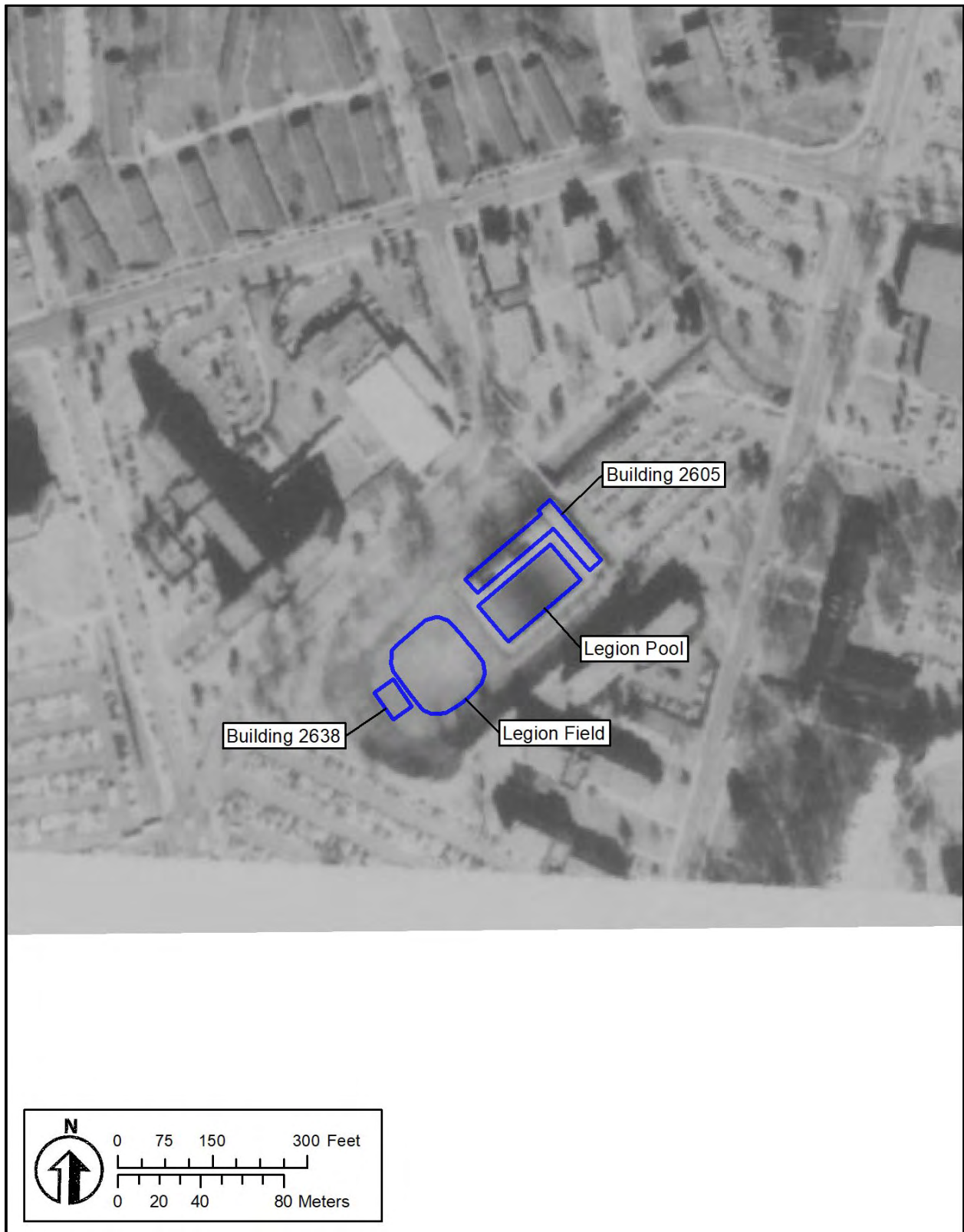


Figure 1.6 Legion Pool and associated resources on a 1973 aerial map. Note: aerial shows future location of Building 2638.

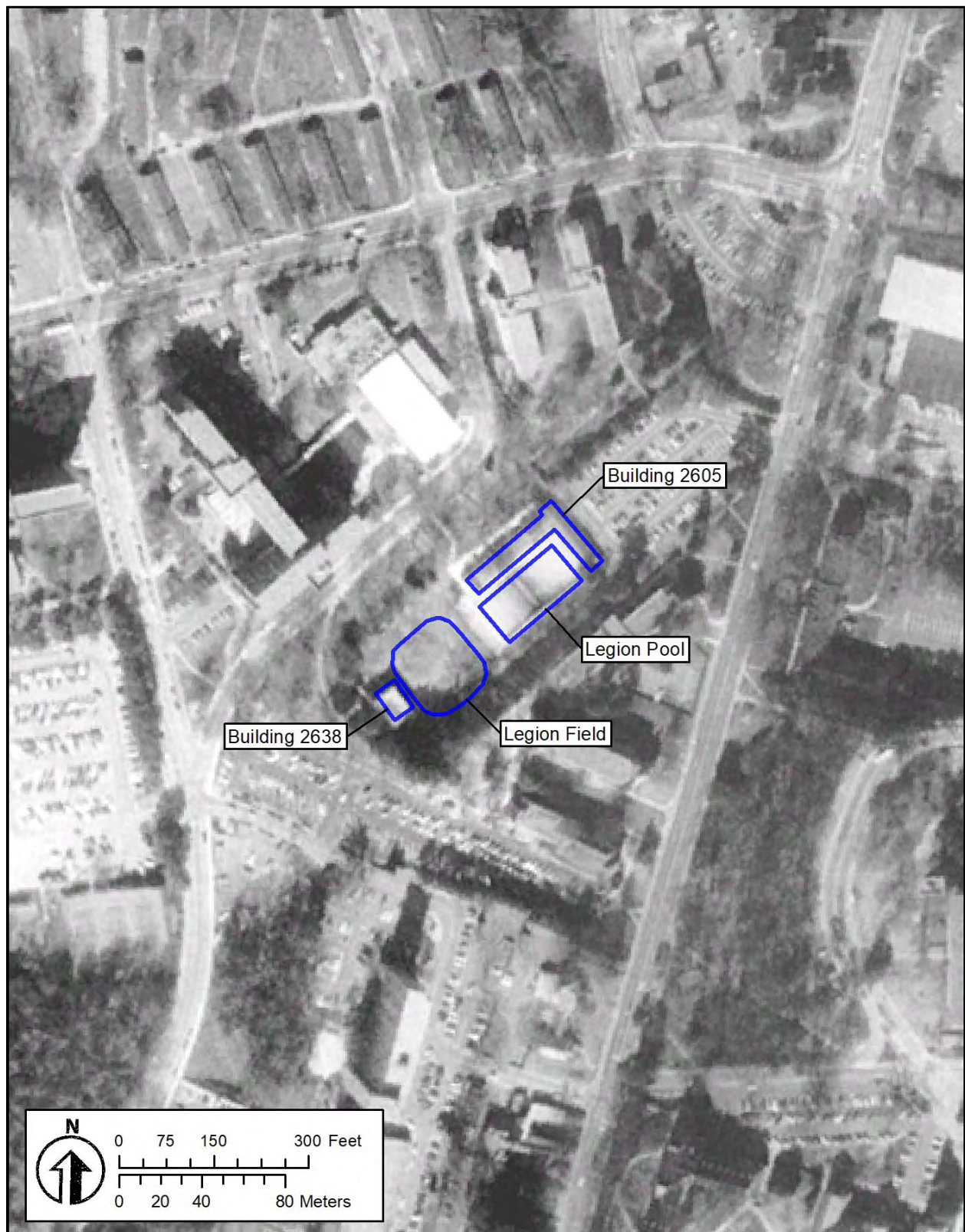


Figure 1.7 Legion Pool and associated resources on a 1993 aerial map.

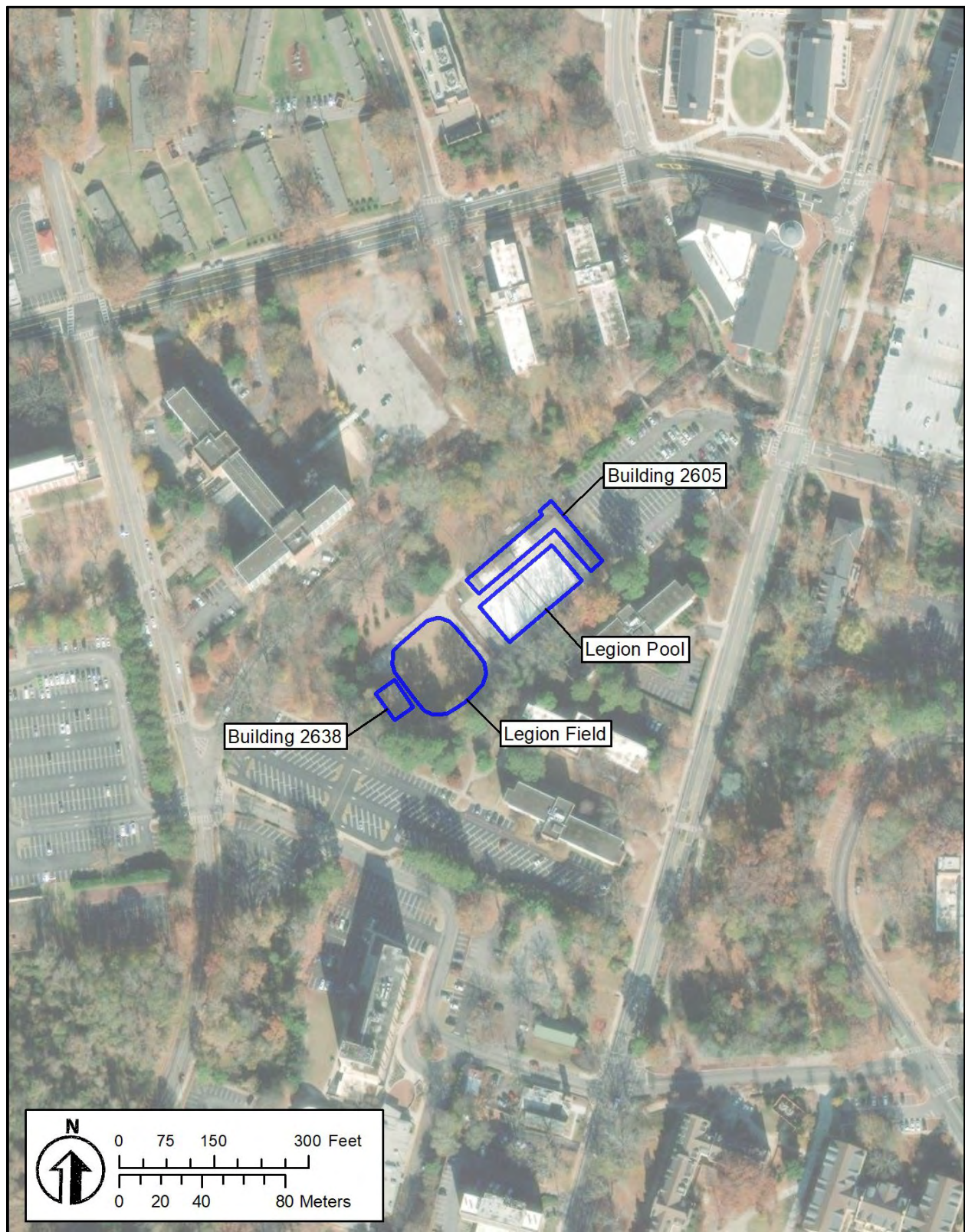


Figure 1.8 Legion Pool and associated resources on a 2025 aerial map.

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2.0 Historic Context

2.1 The American Legion Sponsors Public Works

The American Legion was established in Europe in March 1919 by American soldiers as they awaited demobilization from World War I. Many of the founders were officers who had witnessed “deficiencies in defense, citizenship, and education” of the troops during the conflict. Immediately after the war, they also soon discovered that the United States was ill-equipped to support the mass of returning veterans, particularly those that were disabled or unemployed. Since its founding, the American Legion has campaigned and lobbied on behalf of veterans, provided key support in the establishment of the Veterans Administration (VA) and the GI Bill, assisted veterans in finding employment, and supported and developed medical studies such as those for Post Traumatic Stress Disorder (PTSD) and exposure to toxins in combat zones. In addition, the Legion has also supported local community programs. In 1923, the Legion established a Community and Civic Betterment Bureau “to help municipalities build and improve parks, playgrounds, health-care facilities, swimming pools, schools and theaters throughout the United States” (American Legion 2025).

These community projects were largely sponsored by local individual Legion posts. Articles in *American Legion Weekly* indicate that various public works, including swimming pools, were sponsored across the country during 1920s. In Georgia, historic newspapers indicate the first American Legion swimming pool was likely at Dawson (Terrell County) in 1922. Others were constructed in Buford (1927), Barnesville (1927), Fort Valley (c1930), and potentially Columbus (c1928). In Athens, the Allen R. Fleming, Jr. American Legion Post (#20) had been established in 1919 with 60 charter members and, by 1930, had become one of the largest posts in the State of Georgia with 21 standing service committees. In addition to its obligations to veterans, their widows, and orphans, the Athens post promoted parks and playgrounds, sponsored a local Boy Scout troop, and supported a junior baseball team (*Athens Banner-Herald* June 29, 1930).

2.2 Construction and Early History of Legion Pool

According to one source, the local post may have begun its swimming pool campaign sometime during the 1920s (Save Legion Pool 2025), but the most substantial work came in the 1930s. By 1933, the Athens American Legion post had purchased an 8-acre tract off South Lumpkin Street, known as the “old waterworks property,” for a modern swimming pool and other recreational amenities (*Athens Banner Herald* September 3, 1933). In September of that year, the Athens City Council approved a resolution supporting the Legion’s plans, stating it would be “of great value to this city and community and will give our people a place of opportunity to enjoy social activities,” and called on other civic organizations to also support the project (*Athens Banner Herald* September 3, 1933).

The pool site’s topography created a “natural bowl” that facilitated grading and construction, but it also required the rerouting of Tanyard Branch, which flowed through the property. Athens tile contractor Charlie Conterio supervised the pool’s construction, which began in 1934 (Doster 2002). However, additional funding was required to complete all the amenities, including the tiling, bathhouse, and landscaping. During the 1930s, the federal government’s “New Deal” benefited such community public works projects with supplemental funding. In 1934, the Federal Emergency Relief Administration (FERA) offered \$18,000 to support completion of the Athens pool project, provided the Legion and local community pledged \$12,500. The Legion hosted a “steak and chicken supper” at the construction site, where they solicited funding and ideas from the city and local bankers (*Athens Banner Herald* June 22, 1934).

According to one article, at some time during the funding process, the American Legion officially transferred the land to the City of Athens “in order to obtain” the funding from the Works Progress Administration (WPA) and Public Works Administration (PWA) (*Athens Banner Herald* September 21, 1952).

Even in the midst of the Great Depression, the City of Athens slowly but successfully raised the additional money through various events. In June 1934, the American Legion sponsored a barbeque, and sent out over 200 tickets to citizens, requesting the purchase of a ticket for \$1.00 each (*Athens Banner Herald* June 11, 1934). The Legion even proposed hosting a boxing match and a “crazy politics event” to raise funds (*Athens Banner Herald* October 21, 1934; March 25, 1935). One local sixth grade class held a “rummage sale,” and donated five dollars (*Athens Banner Herald* April 21, 1935). The various fundraising efforts worked and by July 1935, President Franklin D. Roosevelt’s administration announced the approval of public works funding for two Athens projects: the Legion’s pool and the local airport (*Athens Banner Herald* July 3, 1935).

While construction work on the supporting buildings and landscaping remained incomplete, Legion Pool itself opened in July 1935. At 150 feet long by 75 feet wide, and depths ranging from 2.5 to 9 feet, it was the largest public pool between “Richmond and Miami” (Doster 2002). Temporary lights were installed to allow swimming at night, temporary bath houses were erected while construction of the permanent structures continued, and a “regulation” diving board was officially installed at the end of July (*Athens Banner Herald* July 16, 1935; July 28, 1935).

The new pool was also equipped with a \$5,500 filter plant, “one of the most complete filter systems in America” (*Athens Banner Herald* July 16, 1935). Designed by the International Filter Company of Chicago and constructed by J.F. Cole, the plant included three modern 200-gallon tanks, as well as the latest type of chlorinators and amoniators. A combination of both chlorine and ammonia were thought to be a “more effective germ killer” than the individual chemicals and they were thought to be “less injurious to the eyes and nasal membranes.” The pool also included a modern vacuum system that allowed cleaning without draining the water (*Athens Banner Herald* July 16, 1935).

The new facility was immediately popular with local citizens. The American Legion charged nominal admission fees (25 cents for adults and 10 cents for children), but children under 17 were allowed free admittance on Monday and Tuesday mornings. “Smiles were on every face as the children dived, swam, and played around,” noted one news reporter. “One little chap was noticed splashing around in abbreviated short overall pants. He, too, was having a fine time” (*Athens Banner Herald* July 16, 1935). The Legion also sponsored free (upon paid admittance) life-saving lessons, taught by lifeguard Ben Yow (*Athens Banner Herald* July 16, 1935). Patrons could also purchase tickets with special rates at local stores and get \$1.50 worth of swimming for only \$1.00 (*Athens Banner Herald* July 21, 1935).

Finalization of the pool and its associated amenities continued into the Spring of 1936. In April, laborers began laying tile with the goal of completing the project by the last weekend of June, when the state American Legion convention would be held in Athens (*Athens Banner Herald* April 19, 1936). By the end of May, the pool opened for the season. The playground, and men’s and women’s bathhouses (designed by C. Wilmer Heery of Atlanta), were also nearing completion (*Athens Banner Herald* May 31, 1936; June 7, 1936).

C. Wilmer Heery, a resident of Athens and a 1926 graduate of Georgia Tech, trained “in the neo-classical tradition of the French École des Beaux Arts” (Brookwood Group 2025). Heery apprenticed to several Atlanta architectural firms after his graduation, but new construction demand dropped at the onset

of the Great Depression. Heery and his family moved to Athens at the request of UGA professor Rudy Driftmier, who led much of the university's building program during the 1930s. Officially licensed as an architect in 1933, Heery worked as a staff architect until he was appointed Chief Architect of the Atlanta office of the newly established Federal Housing Administration (FHA), and moved with his family in Atlanta. He returned to Athens (his wife was an Athens native) again after World War II, opened an office, and later established Heery & Heery Architects with his son George, with offices in Athens and Atlanta (Brookwood Organization 2025).

Historic photographs (Figures 2.1 through 2.3) show the bathhouse largely retaining the same footprint as today, except it was unpainted and the roofs above the showers and toilets had a raised gable with open sides, likely for ventilation. Windows were wood-framed 12-light units, and the far end wings featured doors capped with flared covers and latticework-type supports. Historic aerials suggest the original construction included a grandstand on the southeast side of the field, but these were demolished by the 1940s. The pavilion on the east side of the pool appears to have been detached from the main bathhouse, although there appears to be a covered entry area between the two.

The Legion also constructed a log cabin (see Figure 2.2) or meeting house to the east of the pool that could be used by both the Legion and other community organizations, such as the Boy Scouts. The cabin was completed by 1934 and officially dedicated in March 1935. The cabin, located on the north side of the present-day Legion Pool parking lot, was actually the first piece of the "community center," which included the pool, playground, and other amenities (*Athens Banner-Herald* March 31, 1935). Based on historic aerials, the cabin, later referred to as the "Legion Hut" (see Figure 2.4) was demolished c1960.

The pool formally opened on June 7, 1936, with a reported 2,000 people in attendance. State WPA administrator Miss Gay B. Shepperson, the featured speaker, said the pool was "a perfect example of what President Roosevelt meant...when he said the Federal government could solve the unemployment problem by putting men to work on projects that would be of a lasting nature" (*Athens Banner Herald* June 8, 1936). The ceremonies included exhibitions by 1924 and 1928 Olympic swimmer H.S. Glancy, who demonstrated several swimming styles. Two comic divers from Atlanta, Jack Deacon and Ed Tylee, performed in "old maid's clothes" and "kept the huge crowd in an uproar." Additional demonstrations included local swimmers Miss Dorothy Philpot, Goodloe Erwin, Billy Peebles, and Albert Weir. UGA was represented by swimmers Asa Candler, William Alexander, and Miss Amy Slocum (*Athens Banner Herald* June 8, 1936).

Following its completion, Legion Pool hosted swimming competitions for the Southeastern Amateur Athletic Union as well as local high school groups. The pool hosted community-open events for bathing suit reviews and music. In 1938, the Legion sold "season tickets" (\$5.00 for adults and \$3.00 for children), which allowed one swim daily, and also offered monthly ticket or coupon books. The poolside "canteen" offered soft drinks, crackers, and cigarettes in the "main office in the northern part of the building," instead of the previous sales area at the south end of the pavilion (*Athens Banner-Herald* May 31, 1938).

During World War II, the pool was offered to UGA's Naval cadets as part of their physical fitness training (*Red and Black* July 13, 2023). Training generally took place during the week, leaving weekends for public access. Cadets were also able to use the "well-furnished post home, in a big log cabin" on site, which included games, magazines, and books. The grounds were transformed with shuffleboard and horseshoe courts, and dances were held beneath the pavilion. The Navy's use of the pool continued until 1944, when UGA constructed a new pool on campus (American Legion 1942, 2021).

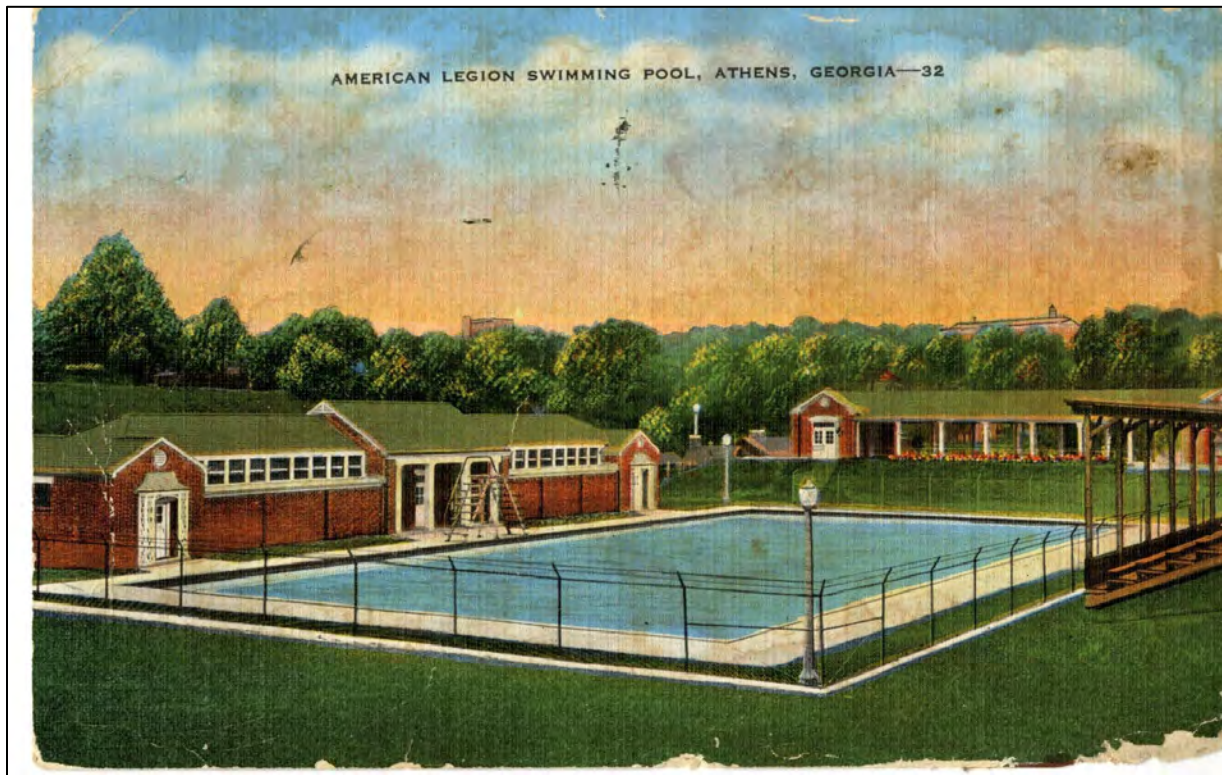


Figure 2.1 Postcard view of Legion Pool, undated. However, the pavilion design does not align with the 1942 photograph in Figure 2.2 (provided by UGA Office of Architects).

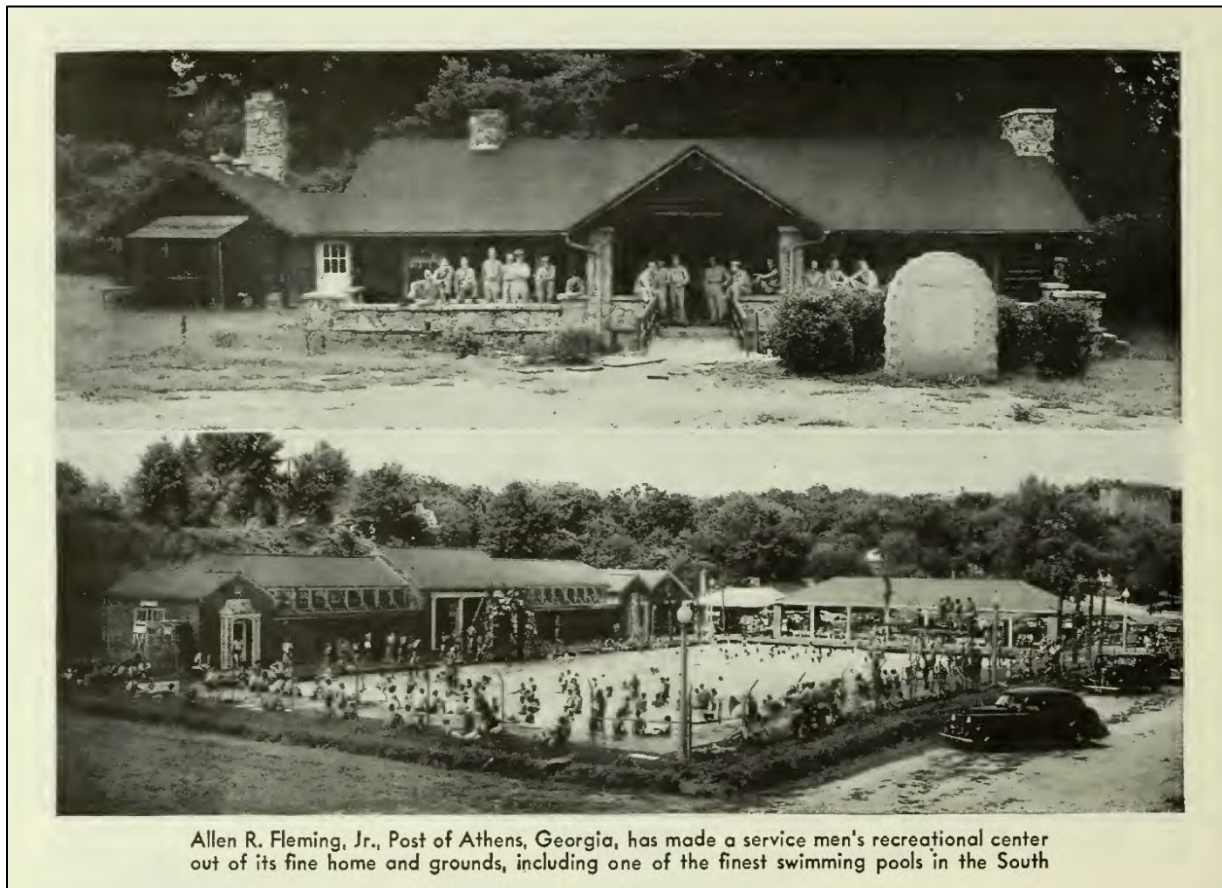


Figure 2.2 World War II-era photograph of the pool (bottom) and log cabin (top, not extant) (American Legion 1942).



Figure 2.3 Swimmers at Legion Pool, 1949. This is the northern corner of the pool near the current concession stand (*Athens Banner-Herald* May 15, 1949).

2.3 UGA Stewardship

In May 1952, the Athens American Legion post voted to support the city in selling the pool property, which included the pool, dressing rooms, pavilion, and the Legion log cabin, to UGA for its own recreational uses for \$75,000. The Athens City Council took the matter into consideration later that year in September, but because the property was originally dedicated for “public use,” any conveyance would need to account for that use. There were also outstanding questions regarding the American Legion’s “private interest” in a portion of the property (City of Athens, Mayor and Council Minutes 1952). The proposition was not without controversy, with local citizens objecting to the University essentially commandeering a public source of recreation (*Athens Banner Herald* September 21, 1952). In 1954, the City deeded the property to the University System of Georgia Regents, although the deed stipulated the City would continue to operate the pool under a lease agreement for 10 years, with another 10-year option. The deed allowed for joint use of the property, except from May 15 to September 15, when the City of Athens would be granted “exclusive use” of the swimming pool, bathhouse facilities, and playground area. The agreement also obligated the City to maintain and operate those same amenities (Clarke County Deed Book [CCDB] 143:18). In 1961, with the enrollment of the first two African American students (Charlayne Hunter-Gault and Hamilton Holmes), UGA desegregated. This also meant the official desegregation of Legion Pool (*Red and Black* July 13, 2023).

During the 1950s through 1980s, concurrent to the pool's continued use, adjacent Legion Field (Figures 2.5 through 2.8) also became a popular recreational area for UGA's student body, which arranged a host of events. During the 1950s, the recreational area appears to have been most popular for intramural sports events. However, beginning in the 1960s and through the 1980s, the field saw more widespread use and, with its surrounding grassed hillsides, provided a natural amphitheater atmosphere. Concerts, pep rallies, tailgate parties, class parties, and even poetry readings and children's television characters were scheduled at the grass field.

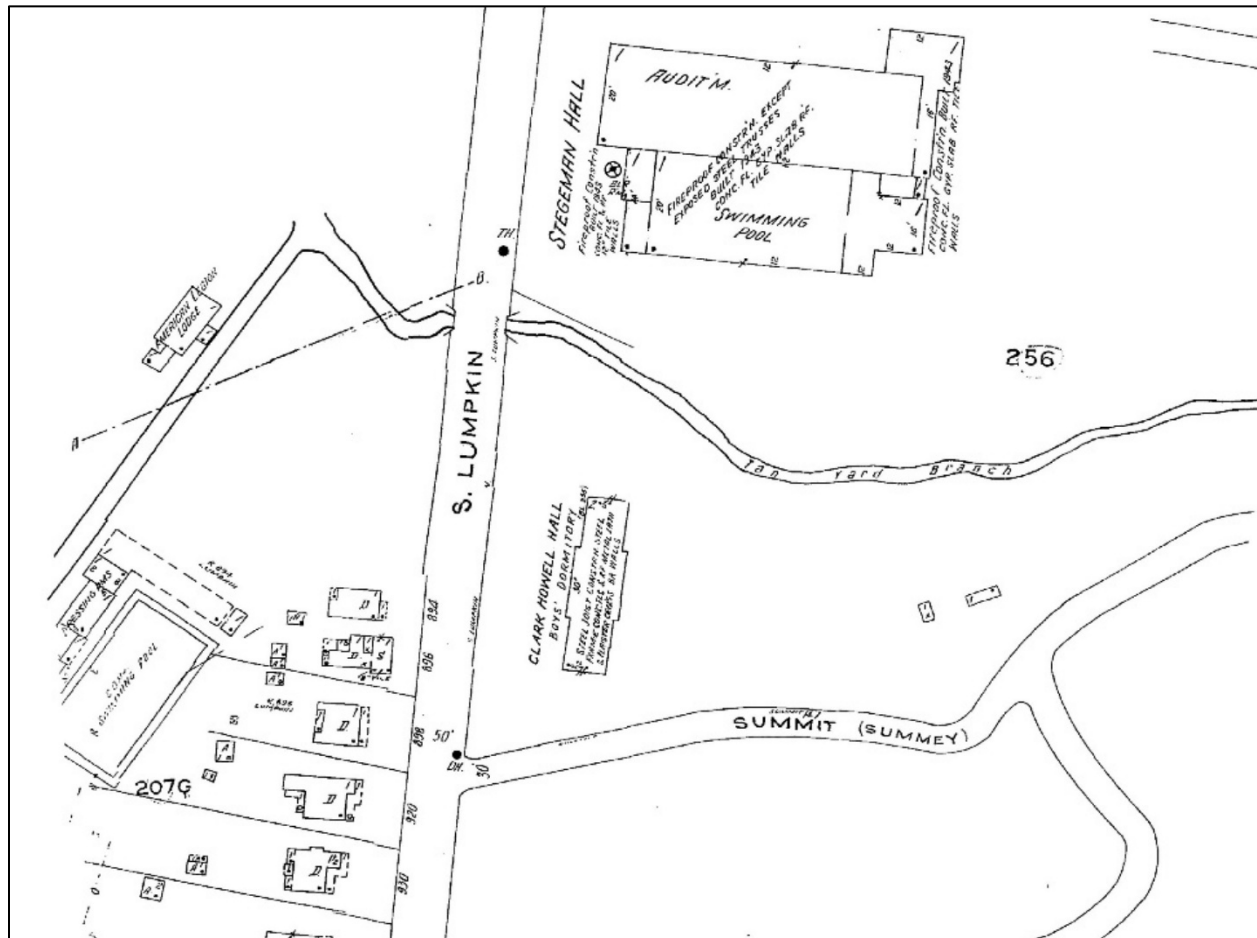


Figure 2.4 Portion of a 1950 Sanborn map showing the pool (far left) and the American Legion Lodge building (upper left). Copy of Sanborn map provided by the Athens-Clarke County Planning Department.

Athens had a vibrant music scene at this time and so, by the 1970s, the field was particularly popular for concerts, which included the Goose Creek Symphony, Bonnie Raitt, Vassar Clements, the B-52s, Gatemouth Brown, R.E.M, and many others. The concerts were not without controversy and were sometimes met with noise and crowd complaints (*Red and Black* May 9, 1972; July 10, 1980, April 24, 1985). Before one concert, University police even arrested Doug Kershaw's (the "Ragin' Cajun") road manager for public indecency (sunbathing nude), although he managed to post bail before the music began (*Red and Black* April 24, 1975).

In 1972, one rowdy festival featured the Athens group Labyrinth (replacing Macon's Wet Willie at the last minute), Some Rise, Melton & Laughing Disaster, and the night's headliner Goose Creek. The student paper stated that by dark, "The Legion area looked like Little Byron or something...replete with dogs,

blankets, and refreshments.” Goose Creek continued playing until nearly 11:00 p.m. when security personnel nudged them to wrap things up (*Red and Black* May 9, 1972). By 1975, UGA had enacted a 10 p.m. curfew to control rowdy behavior, but sometimes the bands still needed a friendly reminder. At one concert, the University Union’s cultural affairs coordinator shortened Doug Kershaw’s performance by cutting off the field’s power (*Red and Black* April 25, 1975). The curfew remained a source of consternation:

[Gatemouth Brown] displayed both of his styles in a two-hour performance that, as we’ve come to expect from a Legion show, grew better as the crowd and the darkness arrived in mid-evening. The only drawback was the early curfew that, as we’ve also come to expect, forced the show’s conclusion just when things were rolling (*Red and Black* September 27, 1978).

In 1985, the *Red and Black* reported that the concerts averaged around 2,000 people, with one R.E.M. event attracting 12,000 people. UGA’s Student Director of Activities noted that the crowds were usually so large that enforcing the no-alcohol policy proved nearly impossible (*Red and Black* September 25, 1985). While a concrete stage on the west side of the field was already in place, in 1983, UGA funded a pre-fabricated shelter (UGA Building #2368) that was installed by Aldridge, Inc. for \$16,000 to support the events (*Red and Black* February 23, 1983). By 1990, a new fence had been constructed around the complex to help contain the masses to a comfortable 4,000 people per event (*Red and Black* April 11, 1990).

By 1975, the City of Athens had opened another swimming pool at Bishop Park. With Legion Pool in need of upgrades and repairs, “[the City] was no longer interested in continuing to manage Legion.” Until that time, because of the 1954 deed agreement UGA did not budget for its operation and, for the 1975 season, the Student Government Association “held an emergency referendum to allocate \$3,100” to support immediate repairs so the pool could open (Save Legion Pool 2025). The pool underwent major renovations in the late 1970s and early 1980s. This included significant repairs to the pool floor (patchwork repairs were superseded by a full replacement); all of the original tile lining the floor was removed and replaced with a marble-dust cement base bed. The original underwater lighting, composed of antique fixtures with irreplaceable parts, was also removed and replaced. Drainpipes were replaced and a new fence was installed around the pool’s perimeter (*Red and Black* April 6, 1978; February 23, 1983). During this same period, the original tile around the pool deck was replaced, the pavilion materials were replaced, the shower stalls were modernized, and the bathhouse was modified to its current aesthetic (*Athens Observer* June 28, 1979). Figures 2.9 through 2.12 provide images of the pool during the 1970s.

In the early 2000s, UGA found significant leakage in the aging pool and proposed its demolition. In 2012, according to one assessment, the pool dropped three inches per day and leaked 24,000 gallons of water into nearby Tanyard Creek. Officials estimated \$490,000 to renovate Legion Pool and proposed constructing a new pool (estimated at over \$2 million) half its size at Lake Herrick near other recreational resources. A newer, smaller pool would result in less than \$100,000 in annual operating expenses and the valuable acreage on Lumpkin Street could be repurposed for residential or academic buildings. However, the Athens public balked at losing the historic pool as a community resource and campaigned to save it from demolition (*Flagpole* August 22, 2012). The pool continues to serve both the University as well as the local community and opens each May for the summer season.

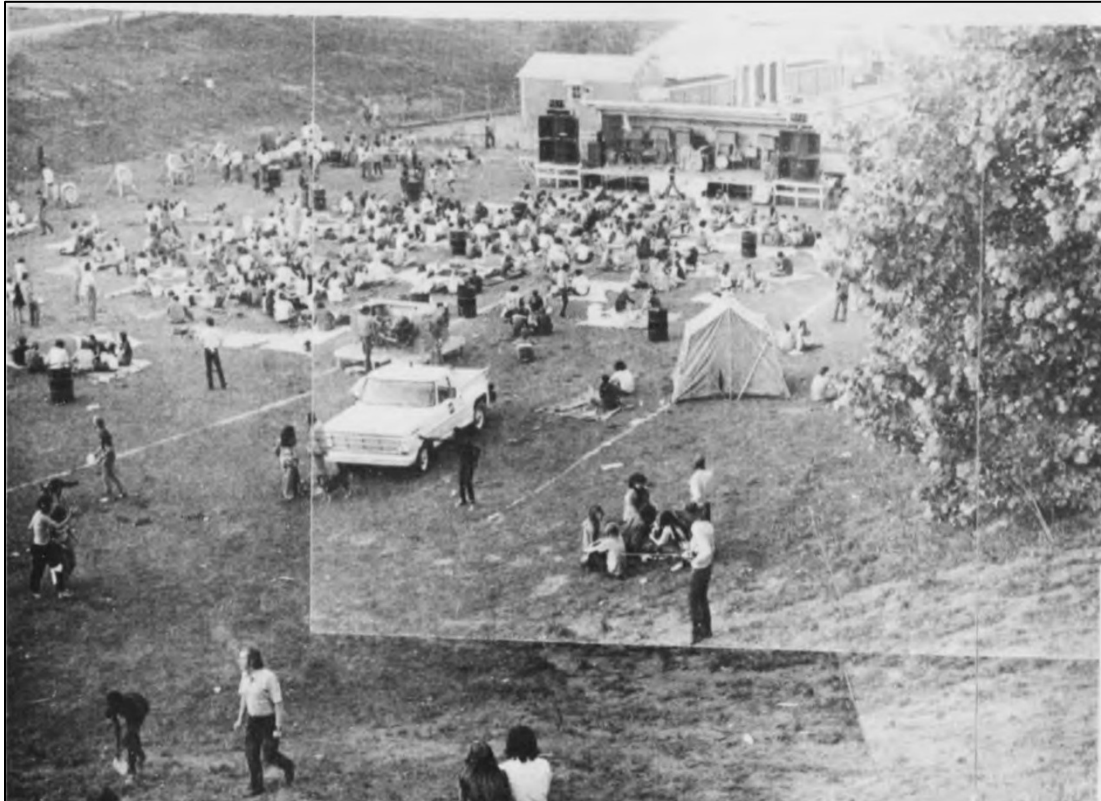


Figure 2.5 View of Legion Field with pool in background (*Red and Black* May 9, 1972).



Figure 2.6 View of Legion Field concert stand, prior to the addition of the metal shelter, early 1980s (photograph from UGA Hargrett Library).



Figure 2.7 View of Legion Pool (left) and field (right), early 1980s. New concert stand shelter is visible at far right (photograph from UGA Hargrett Library).



Figure 2.8 View of Legion Pool (left) and field (foreground) early 1980s (photograph from UGA Hargrett Library).

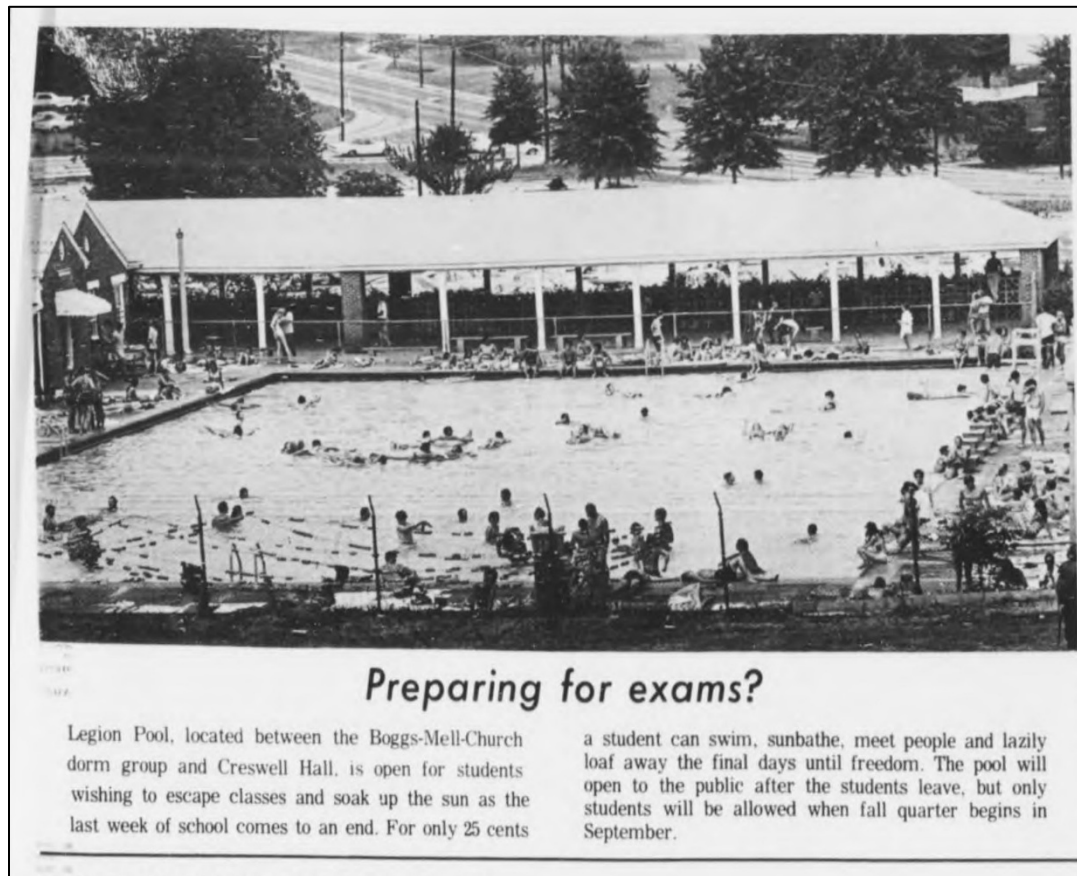


Figure 2.9 View of Legion Pool and pavilion, 1970 (*Red and Black* May 26, 1970).



Figure 2.10 Cleaning of Legion Pool, 1973. Note original tile at pool ledge (*Red and Black* April 17, 1973).

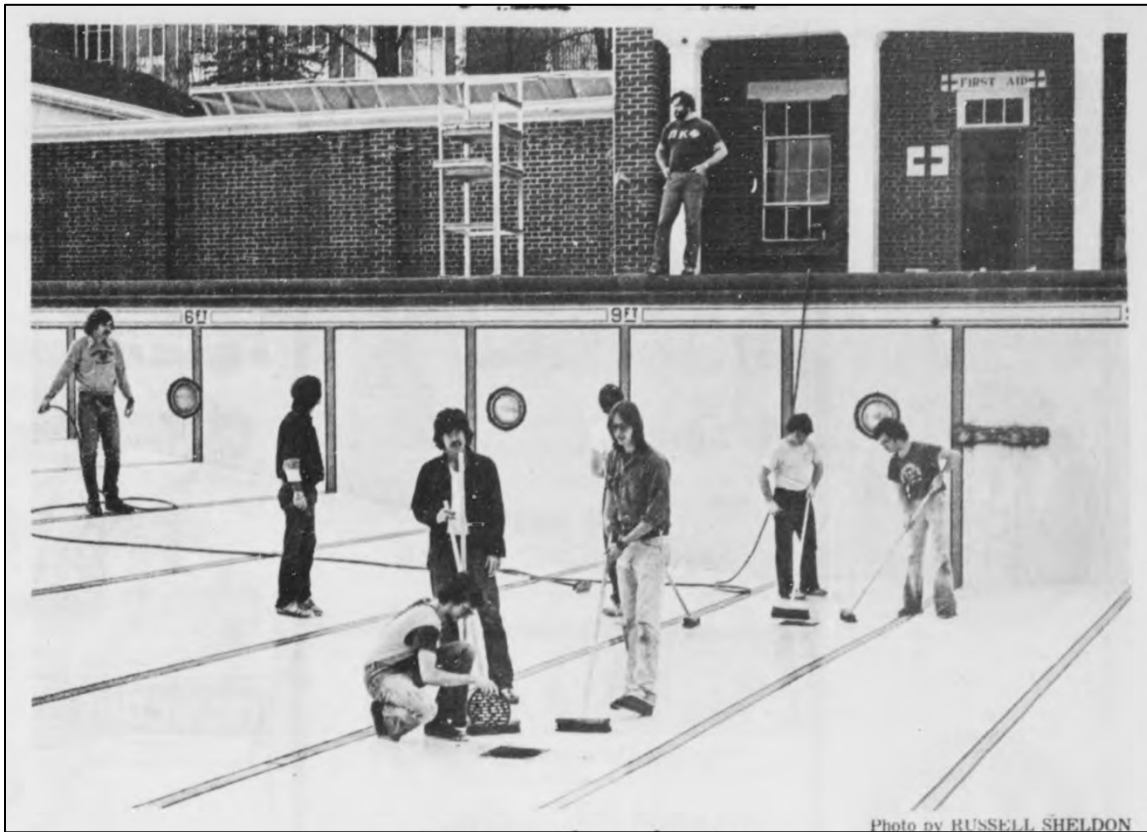


Figure 2.11 Readyng Legion Pool for the season, 1977. Also showing original unpainted brick walls and windows of pool houser (Red and Black March 4, 1977).

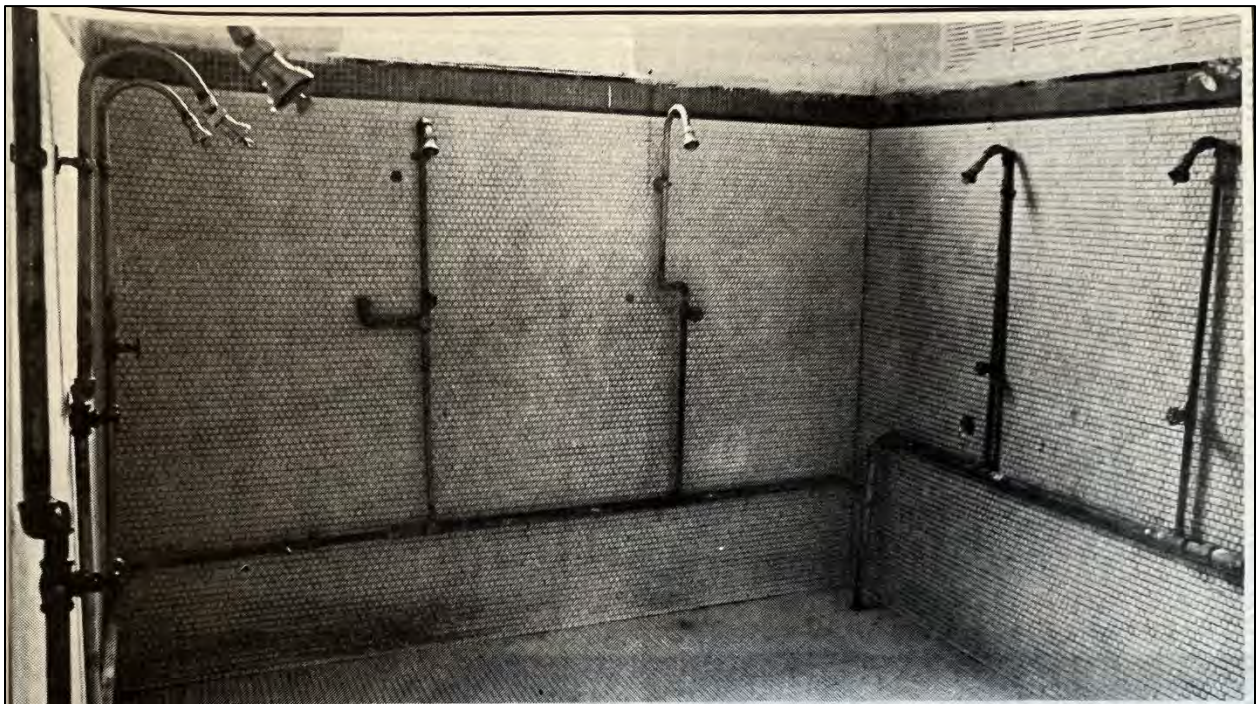


Figure 2.12 View of original showers in bathhouse (Athens Observer June 28, 1979).

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3.0 Resource Description and NRHP Evaluation

During this study, Brockington documented Legion Pool and its associated resources, all located at 802 South Lumpkin Street in the northern portion of the UGA campus in Athens. The facility, which includes Legion Pool (no number), the pool bathhouse (Building No. 2605), Legion Field (no number), and a non-historic concert stand (UGA Building No. 2638), is situated west of South Lumpkin Street between the Hill and Creswell residential halls (see Figures 1.1 through 1.8). The pool and bathhouse were constructed in 1935 and 1936 and the concert stand was constructed in 1983. The pool is oriented northeast-southwest, with the bathhouse forming an L-shape on the northwest and northeast sides of the pool. No original plans for Legion Pool or its bathhouse (Building No. 2605) were found, although the Hargrett Library does retain plans for the original 1930s filter system and its orientation within the basement level of the bathhouse. Figures 3.1 through 3.38 provide photographs of the complex.

The c1936 bathhouse (Building #2605), located on the northwest side of the pool, includes space for gender-based bathrooms and showers, mechanical and storage areas, and other support spaces. Although its architectural design has been somewhat modified, it still features some of its original Colonial Revival style aesthetic, with brick walls, gable roofs, and brick detailing. Many of the doors are non-historic metal replacement units, with windows also being non-historic, two-over-two, double-hung sash replacements. The building consists of five distinct bays, with each end bay having a front-gabled functional space (currently used for storage of chemicals or other materials). The interiors of these two functional sections include terracotta block walls, although the southern wing has some remaining tile on its interior wall (see Figure 3.24).

The next two bays toward the center include the men's and women's restrooms and shower areas (see Figures 3.25 and 3.26). These sections currently have a flat roof, but historic photographs show them originally with raised rooflines (see Figures 2.1 and 2.2) that were likely open and used for ventilation. Ghost marks of the original rooflines are visible on the gabled ends of the central portion of the building (see Figure 3.7). The exterior walls of the restroom areas also feature decorative brick detailing near the roofline. The interiors of the restrooms have been modernized (c1980) with new fixtures, benches, and tiled shower walls.

The central portion of the pool house features a side-gabled roof with louvered vents at the tops of the gabled ends. The poolside façade features four wood columns and a recessed entry. The entry includes a central non-historic, single-leaf door with an original three-light transom above. The flanking windows are modern, one-over-one, vinyl, double-hung units. This interior portion also exhibits several modifications with infilled doors and varying wall materials. The ceiling is also a modern drop ceiling. Recent repairs revealed what appears to be the original, decorative, pressed metal ceiling (see Figure 3.29). Based on historical photographs, the exterior changes to the bathhouse (including the painting of the brick) appear to have been made during the late 1970s renovations.

The basement level (see Figures 3.32 and 3.33) features unadorned formed concrete floors, walls, and ceiling. All of the pool filtration equipment has been modernized, but portions of the original concrete stands for the filter tanks remain on the floor. One of the walls on the northeast side of the basement level includes the carved name of "Woodson Ashford, 1942." This appears to be George Woodson Ashford, born in Watkinsville, Georgia, in 1908. Ashford attended high school in Athens and briefly attended UGA before his acceptance into the U.S. Naval Academy in 1925. Ashford served in World War II, rising to the rank of Captain. He later served in the Korean War and died in 1981, having reached the rank of Rear Admiral

(U.S. Naval History and Heritage Command [NHHC] 2025). By 1942, when his name apparently was carved at the pool house, Ashford was already a Lieutenant but may have been visiting Athens on leave.

The pavilion (considered part of Building #2605; see Figures 3.21 through 3.23), located near the northeast end of the pool, is an open wood-framed structure with a wood trussed gabled roof clad in asphalt shingles. It measures approximately 125 feet long by 25 feet wide and is primarily supported with brick piers. The northeast side has additional wood supports set on a pierced concrete block wall, with those on the southwest side full height wood posts. The interior is open on all four sides, with the pool-side portion of the pavilion divided from the entrance area by a louvered upper wall. The pavilion is surrounded by decorative plantings and large crepe myrtles. Historic photographs (see Figure 2.2) suggest the pavilion and bathhouse were originally detached, with a covered access area between the two. However, based on historic aerials, the pavilion had taken its current connecting form by 1962.

Legion Pool (see Figures 3.11 through 3.15) measures approximately 150 feet in length by 75 feet wide. It ranges in depth from 2.5 feet at the opposite shallow ends to 9 feet at the center. It is largely lined with concrete, with the sections divided by inlaid black tile installed in the 1970s. The sides of the pool are concrete, though the upper walls are lined with 1-by-1-inch blue and white ceramic tile. The gutter and pool edge also feature black tile borders and the surrounding deck area is poured concrete. The majority of these construction materials date to the late 1970s renovations. Diving boards and stairs are modern, detachable, fiberglass units.

The large, grassed lawn located southwest of the pool is known as “Legion Field” (Figures 3.34 through 3.38). The field is surrounded by a non-historic sidewalk with a non-historic stone wall on the southeast side. The northwest side of the field includes large Magnolia trees, some of which may date to the 1930s when the pool was installed. The far southwest end of the field contains the c1983 concert stand (UGA Building #2638). This metal-framed stand is situated on a raised concrete platform. As noted in Chapter 2, Legion Field was commonly used for concerts and other events for the UGA student body and remains popular for tailgating during football season.

3.1 NRHP Evaluation

The Georgia State Historic Preservation Office (SHPO) commented on the National Register of Historic Places (NRHP) eligibility of the pool during a 2012 demolition proposal. The SHPO noted that based on the information provided, it was their opinion that Legion Pool and its associated “Service Building” (presumably the bath house) were eligible for the NRHP, but no further information was provided (Crass 2012).

Archival research did not identify any information to warrant evaluation for the NRHP under Criterion B (*people*) or D (*information potential*). Under Criterion A (*events*), Legion Pool, its bathhouse, and Legion Field were part of a recreational complex first envisioned by the local American Legion post. The complex was completed between 1935 and 1936 and was funded through a collaboration between the American Legion, the City of Athens, and local citizens, as well as New Deal monies. While the City of Athens (with the Legion’s support) sold the pool and its grounds to UGA in the 1950s, it was managed by the city into the 1970s and remains open to the public today. The associated Legion Field, which was always used for recreational purposes, gained greater popularity with the UGA student body beginning in the 1970s when it was frequently used for sponsored musical and other events. Therefore, Legion Pool, the pool house, and Legion Field all qualify for the NRHP under Criterion A (*events*) at the local level in the areas of recreation, entertainment, and social history.

Under Criterion C (*architecture*), the pool has lost some degree of integrity in terms of its material cladding, but the overall design of the pool (dimensions, depth, etc.) remains the same. While the tiling around the pool is not original, it was installed during the late 1970s, close to the 50-year age mark, and it does not detract from the overall design. Modifications have been made to the bathhouse, originally designed by C. Wilmer Heery, but it retains certain key features including the brick cladding, the overall one-story linear form, most of its gabled roofline, the recessed entry, the rear wall brick detailing, and the perpendicular, open pavilion. Legion Field has been somewhat modified with a new stacked stone wall, new concrete sidewalk circumscribing the grassed lawn, and a non-historic (c1983) concert stand, but it still reflects the defining open space that was used by the public as part of the recreational grounds, as well as by the student body for concerts and football events. Brockington recommends that Legion Pool, its pool house (UGA Building #2605), and Legion Field qualify as an NRHP-eligible complex. However, the non-historic concert stand (UGA Building #2638), built in 1983, is not considered a contributing element. Other non-contributing elements include the non-historic landscape features including the sidewalk and the stone wall around Legion Field.



Figure 3.1 Pool House, near entry, facing south.



Figure 3.2 Pool House, facing southwest.



Figure 3.3 Pool House, facing west.



Figure 3.4 Pool House, facing west.



Figure 3.5 Pool House, rear elevation, facing south.



Figure 3.6 Pool House, rear elevation, facing east.



Figure 3.7 Pool House, ghost mark of old roofline, facing east.



Figure 3.8 Pool House, southwest elevation, facing northeast.



Figure 3.9 Pool House, rear elevation, brick detail, facing southeast.



Figure 3.10 Pool House, rear elevation detail, facing south.



Figure 3.11 Pool House and pool (foreground), facing west.



Figure 3.12 Pool House and pool (foreground), facing northwest.



Figure 3.13 Pool House and pool (foreground), facing northwest.



Figure 3.14 Pool tile detail at west end.



Figure 3.15 Pool House (left) and pool (center), facing northeast.



Figure 3.16 Pool House, front elevation, facing north.



Figure 3.17 Pool House, front elevation, main entry block, facing northwest.



Figure 3.18 Pool House, front elevation, showing recessed entry, facing southwest towards men's room door.



Figure 3.19 Pool House, front elevation, showing recessed covering at concession area, facing northwest.



Figure 3.20 Pool House, front elevation, facing west.



Figure 3.21 Pool House, pavilion area, facing southeast.



Figure 3.22 Pool House, main entry to pool area, facing southwest.



Figure 3.23 Pool House, pavilion area, showing louvered wall, facing northwest.



Figure 3.24 Pool House, southernmost wing, showing interior.



Figure 3.25 Pool House, women's changing area.



Figure 3.26 Pool House, men's changing area.



Figure 3.27 Pool House, central block, office area.



Figure 3.28 Pool House, central block, storage area.



Figure 3.29 Pool House, central block, rear storage area, showing remnants of pressed metal ceiling.



Figure 3.30 Pool House, central block, office area, door detail.



Figure 3.31 Pool House, concession area interior at northeast end of building.



Figure 3.32 Pool House, basement, showing equipment, facing south.



Figure 3.33 Pool House, basement area wall near pumps, showing name of Woodson Ashford, 1942.



Figure 3.34 Legion Field, facing northeast.



Figure 3.35 Legion Field, facing northeast.



Figure 3.36 Legion Field, facing west.



Figure 3.37 Legion Field concert stand, facing south.



Figure 3.38 Legion Field, concert stand facing west.

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1180 East Broad Street
Athens, Georgia 30602

**RE: UGA: Demolish Legion Pool and Bathhouse/Pavilion, 802 South Lumpkin Street, Athens
Clarke County, Georgia
SP-251001-001**

Dear Mr. Messer:

The Historic Preservation Division (HPD) has received the information submitted concerning the above referenced project, including the report entitled, *Historic Resource Study: Legion Pool Complex at the University of Georgia, Athens, Clarke County*, prepared by Brockington and Associates, Inc. and dated June 2025, and the memorandum entitled, *Archaeological Survey of the West Precinct Legion Block*, prepared by Nutter + Associates, Inc. and dated April 18, 2023. Our comments are advisory and offered to assist the Georgia Board of Regents (BOR) and University of Georgia (UGA) in determining if the agency's actions constitute a significant impact to the quality of the environment in order to complete an Environmental Effects Report (EER) as defined by the Georgia Environmental Policy Act (GEPA; O.C.G.A. 12-16-4) and/or in compliance with the State Agency Historic Property Stewardship Program (State Stewardship; O.C.G.A. 12-3-55) and are offered to assist the UGA in following the standard operating procedures (SOP) outlined in the UGA *Historic Preservation Master Plan* (HPMP). HPD's role under GEPA/State Stewardship is to provide advisory comments on the agency's proposed action as it relates to historic properties. This letter provides evidence of initial consultation with our office in accordance with the provisions outlined in GEPA/State Stewardship and the UGA HPMP.

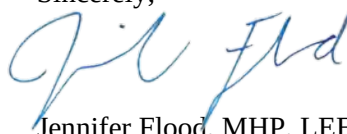
The subject project consists of demolishing the circa (ca.) 1936 Legion Pool, Legion Pool Service Building, also known as the Legion Pool House/Bathhouse and UGA Building 2605/2638, Legion Pool Pavilion/UGA Building 2605, and the ca. 1983 concert stand all located within the Legion Pool Landscape Character Area/No. 14 on the UGA campus at 802 South Lumpkin Street in Athens in order to expand the adjacent Legion Field and construct a community green space, amphitheater, and additional student parking. Based on the information provided and in accordance with SOP 10 of the HPMP, HPD concurs that the Legion Pool Landscape Character Area/No. 14 is eligible for listing in the Georgia/National Register of Historic Places (G/NRHP) and that Legion Pool, the associated service building/bathhouse, and pavilion contribute to the eligible character area and are considered UGA Category 2 buildings per the HPMP. HPD also concurs that the concert stand does not contribute to the G/NRHP-eligible Legion Pool Landscape Character Area/No. 14, due to age. As such, in accordance with SOP 11 of the HPMP, it is HPD's opinion that the subject project will have a significant impact on historic properties that are eligible for listing in the G/NRHP. The demolition of UGA Category 2 elements/contributing resources within a G/NRHP-eligible property is not consistent with the State of Georgia's *Standards for the Treatment of Historic Properties*.



HPD notes that for a demolition project deemed to have a significant impact as outlined in SOP 12, scheduling a public meeting in accordance with SOP 14 may be prudent regardless of the EER publication date. If UGA decides additional discussion of the project or the provided comments is warranted, including discussion of appropriate mitigation to address the significant impact, in accordance with SOP 13 of the HPMP, HPD is available for technical assistance consultation. Furthermore, please note that if a federal agency becomes involved in this project through a permitting process, loan guarantee, grant, or other mechanism, consultation will be required under Section 106 of the National Historic Preservation Act of 1966, as amended.

Please refer to project number **SP-251001-001** in any future correspondence regarding this project. If we may be of further assistance, please contact Stacy Rieke, Environmental Review Program Manager, at Stacy.Rieke@dca.ga.gov or (470) 522-7979 or Noah Bryant, Compliance Review Archaeologist, at Noah.Bryant@dca.ga.gov or (404) 679-0649.

Sincerely,

A handwritten signature in blue ink, appearing to read 'J. Flood', is positioned above the printed name.

Jennifer Flood, MHP, LEED Green Associate
Division Director
Deputy State Historic Preservation Officer

JAF/smr

cc: Elissa Ryan, Georgia Board of Regents
Maggie Discher, UGA
Jody Graichen, Northeast Georgia Regional Commission
Beth Eavenson, DCA Regional Services, Region 5

Appendix 8

UGA Archaeological File Review



UNIVERSITY OF
GEORGIA

Franklin College of
Arts and Sciences

Department of Anthropology

Laboratory of Archaeology

October 21, 2025

CORRESPONDENCE

GEORGIA ARCHAEOLOGICAL SITE FILE

Geo-Hydro Engineers
1000 Cobb Place Boulevard, Suite 290
Kennesaw, GA 30144

Greetings:

As per your request, a search of the Site File records was completed in order to determine if there are any previously recorded archaeological sites within a **1-mile** radius of the following project area:

PROJECT NAME – **UGA Legion Pool**
TOPOGRAPHIC QUADRANGLE – **Athens East and West**
COUNTY – **Clarke**

There are **36** sites located within a **1-mile** radius of your project area. There are **38** projects (**1775, 4437, 5847, 5850, 5898, 7388, 7611, 7648, 8895, 9685, 9950, 10176, 10294, 10299, 10300, 10304, 10305, 12794, 12804, 13101, 13638, 13728, 13729, 13822, 13926, 13929, 13930, 13931, 14181, 14183, 14374, 14484, 14540, 14646, 14789, 14805, 14830, 14831**) located within this area.

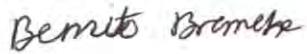
Although research conducted at the Georgia Archaeological Site File is useful for gaining a preliminary understanding of the distribution of archaeological resources in a given area, there are important limits to this data that must be understood to evaluate the data properly. First, the presence of a few sites in the area of interest does not by any means imply that the location of *all* sites in the area are known. In most cases the data are quite spotty. Second, archaeological salvage and mitigation work on *known* sites may ultimately turn out to be less expensive than the mitigation of *unknown* sites discovered later in a project. Human settlement has traditionally been centered upon well-drained soils on level ground with a nearby fresh water supply. While areas meeting these obvious criteria are certainly more likely locations for archaeological sites than other locations within a project area, there *may* be sites located anywhere within an area. **In light of these factors, it is often prudent to seek the consultation of a professional archaeologist to assess the possible impact of a proposed project on its cultural resources.**

Please be aware that there could possibly be sites that have not been detected in these areas. The limitations of a site search done at the Georgia Archaeological Site File are more completely explained in our Paragraph of Disclaimer. Please know that this search does not fulfill the requirements of the Section 106 laws in the National Historic Preservation Act. If you have questions on the Section 106 law, please contact the Environmental Review Coordinator at the Georgia State Historic Preservation office at (770) 389-7851. If you have any questions or need additional information from the Georgia

Archaeological Site Files, do not hesitate to call us at (706) 542-8737.

PLEASE NOTE THAT SITE FORMS, PROJECT REPORTS, THE SITE FILE MAPS OR ANY OTHER INFORMATION REGARDING SITE LOCATIONS ARE NOT FOR PUBLIC RELEASE.

Sincerely,

A handwritten signature in cursive script that reads "Benito Emrich-Branche".

Benito Emrich-Branche
GASF

April 18, 2023

Mr. Scott Messer
Director of Historic Preservation
Office of University Architects for Facilities Planning
382 East Broad Street
Athens, Georgia 30602

RE: Archaeological Survey of the West Precinct Legion Block, UGA Tracking No. 2023-0002

Dear Mr. Messer:

Per your email request dated February 10, 2023, Nutter and Associates (NAI) executed appropriate investigative measures to insure that any proposed infrastructure improvements or building construction within a ca. 20-ac tract along the western side of Lumpkin Street on the University of Georgia (UGA) campus would not adversely affect significant cultural resources. The project area is located on the western side of Lumpkin Street, covering an area that encompasses Legion Field and Pool, several student dormitories, and other UGA facilities and their associated parking areas and access roads (Figure 1). The area is heavily developed. The boundary for the area of potential effect (APE) follows South Lumpkin Street along the eastern side, Baxter Street along the northern end, and East Cloverhurst Avenue along the western side. The southern boundary encompasses the Oglethorpe House and Oglethorpe Dining Commons complex before joining South Lumpkin Street. The entire 20-ac tract covers what once was a broad ridge nose that descends gradually northeast toward Tanyard Creek. Along the western edge of the tract is a tributary of Tanyard Creek. The northern end of the tract is dissected by another branch of Tanyard Creek. The confluence of these two tributaries is generally located beneath Legion Pool. Tanyard Creek flows east and exits the APE beneath South Lumpkin Street (Figure 2).

Archival research reviewed early-middle twentieth century aerial photographs dating from 1934, 1938, 1944, 1960, and 1967 and the USDA 1927 Clarke County soil survey map. The project area was georeferenced onto these archival sources to observe changes to the project and surrounding area through the twentieth century. The 1927 USDA Clarke County soil survey map depicts no structures in the project area. The 1934 aerial photograph reveals a series of structures, presumably residences, running along the western side of South Lumpkin Street for about two-thirds the length of the eastern APE boundary. The northern one-third was not built upon. A cluster of about six structures also are present immediately south of Baxter Street, on a toe slope at the confluence of the two Tanyard Creek branches. The 1938 aerial photograph reveals little change, but by 1944 Legion Field is visible. By 1960, dormitories have taken the place of the residences along South Lumpkin and Baxter Streets, and other buildings have been constructed on the southern end of the tract. Legion Pool also is visible. By 1967 the entire tract is very heavily developed. Since 1967, the tract has undergone a number of construction episodes that have modified or replaced original UGA buildings.

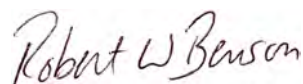
The Georgia Archaeological Site File (GASF) revealed one site, 9CA216, to be located within 1 km of the project area. 9CA216 records a historic period dump deposit comprised of two lenses of historic period debris. The site was identified during archaeological site monitoring of a steam line project on the northern side of Tanyard Creek (Jones 2018). Jones (2018) attempted to reconstruct some of the Athens disposal patterns during the late nineteenth and early twentieth centuries, since the artifacts that were collected during the monitoring project were dated to no later than 1911.

The project area was inspected by NAI field technician James King me on March 3, 2023. King inspected the entire APE by pedestrian survey. The field survey essentially was comprised of 13 photographs. The photographs confirm the amount of construction on the tract. All areas that had vegetation remaining consisted of cut-and-fill areas surrounding structures, parking lots, or access roads that run through the tract. No shovel tests were excavated due to the extensive transformation of the property. No original topographic landforms remain intact.

Archaeological site potential was determined to be very low to nonexistent for the project area largely due intensive use over the past 60 or so years. All evidence of residences that once lined South Lumpkin Street and Baxter Street in the 1930s have been completely obliterated and replaced by much larger University of Georgia structures. After reviewing archival sources through the twentieth century and visual inspection of the project area tract, we conclude that the presence of significant cultural resources is nonexistent. Therefore, since significant cultural resources will not be adversely affected by implementing any future construction projects, we recommend that any proposed projects be allowed to proceed with no further archaeological investigations or monitoring.

If you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in dark ink that reads "Robert W. Benson". The signature is written in a cursive, slightly slanted style.

Robert W. Benson, RPA
Principal Investigator

Reference Cited:

Jones, Joel

2018 *Report on Archival Research and Archeological Monitoring of the West End Improvements Project at Sanford Stadium, the University of Georgia, Athens, Georgia.* Southeastern Archeological Services, Inc., Athens, Georgia. Report prepared for the Office of University Architects for Facilities Planning, University of Georgia, Athens.

Attached Figure List:

Figure 1. Project area superimposed onto a Google Earth Image (2023).	Page 4 of 10
Figure 2. Location of project area on UGA south campus.	Page 5 of 10
Figure 3. Project area superimposed onto the 1934 aerial photograph.	Page 6 of 10
Figure 4. Project area superimposed onto the 1967 aerial photograph.	Page 7 of 10
Figure 5. Looking southwest across the Legion Pool parking lot on the northern end of the project tract.	Page 8 of 10
Figure 6. Looking west across a branch of Tanyard Creek toward dormitories along Baxter Street.	Page 8 of 10
Figure 7. View northeast at the Legion Field dining hall, view from the same location as Figure 6.	Page 9 of 10
Figure 8. Looking southeast from Cloverhurst Avenue across a parking lot, Boggs Hall is in the background.	Page 9 of 10
Figure 9. Looking east across a Tanyard Creek tributary in the southern portion of the project area.	Page 10 of 10

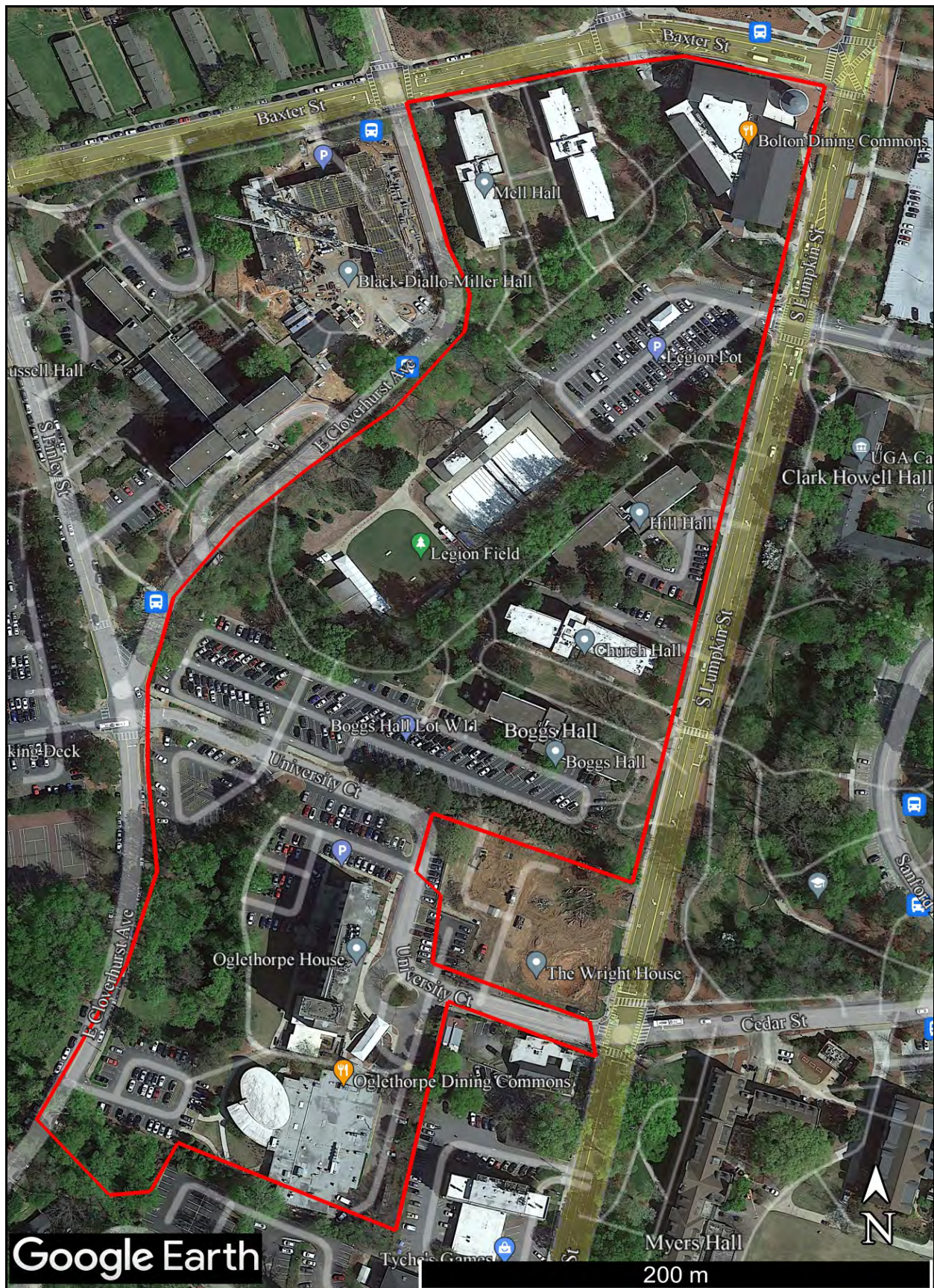


Figure 1. Project area superimposed onto a Google Earth Image (2023).

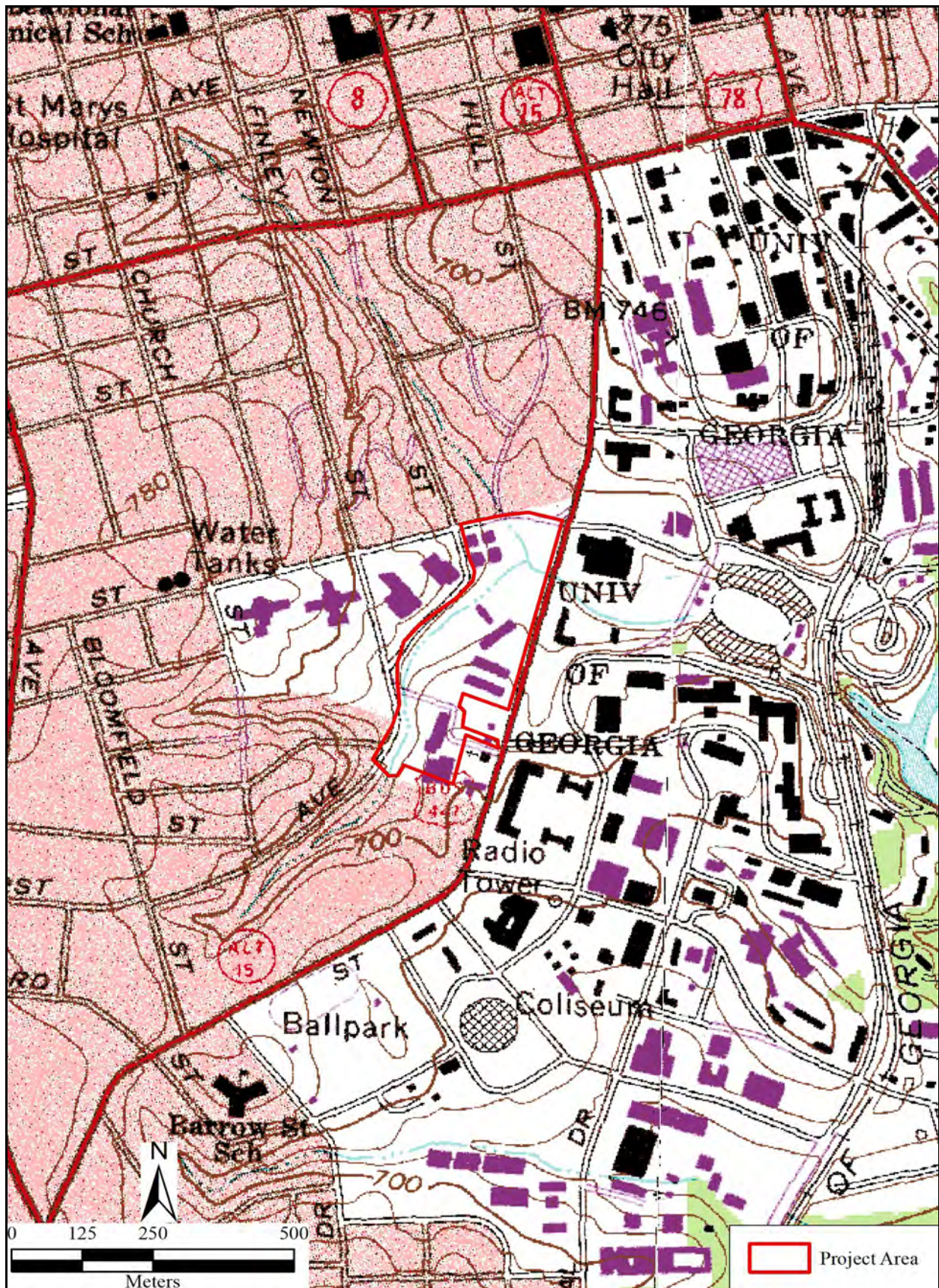


Figure 2. Location of project area on UGA south campus (7.5' USGS Athens West and East quadrangles).

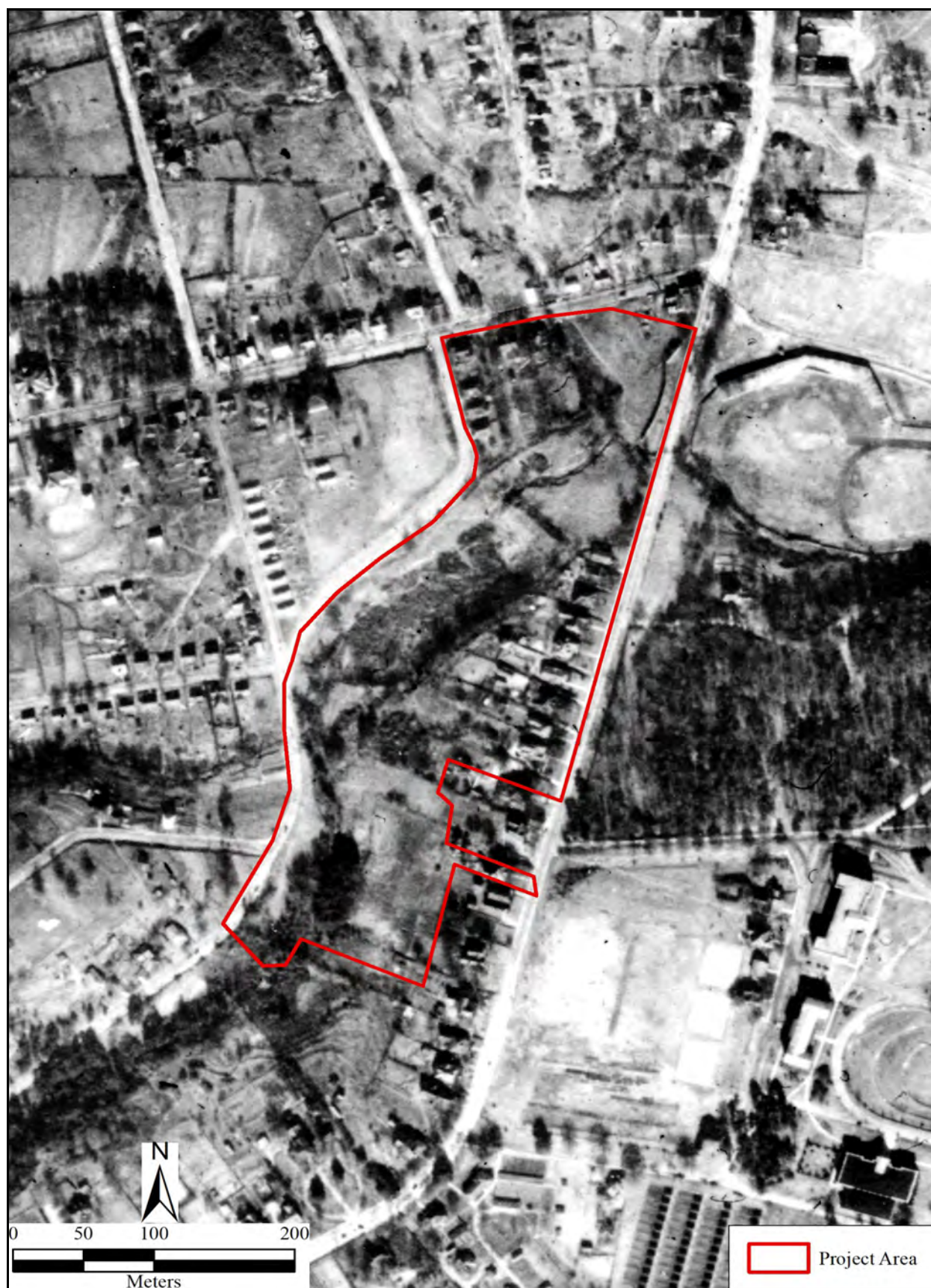


Figure 3. Project area superimposed onto the 1934 aerial photograph.



Figure 4. Project area superimposed onto the 1967 aerial photograph.



Figure 5. Looking southwest across the Legion Pool parking lot on the northern end of the project tract.



Figure 6. Looking west across a branch of Tanyard Creek toward dormitories along Baxter Street.



Figure 7. View northeast at the Legion Field dining hall, view from the same location as Figure 6.



Figure 8. Looking southeast from Cloverhurst Avenue across a parking lot, Boggs Hall is in the background.



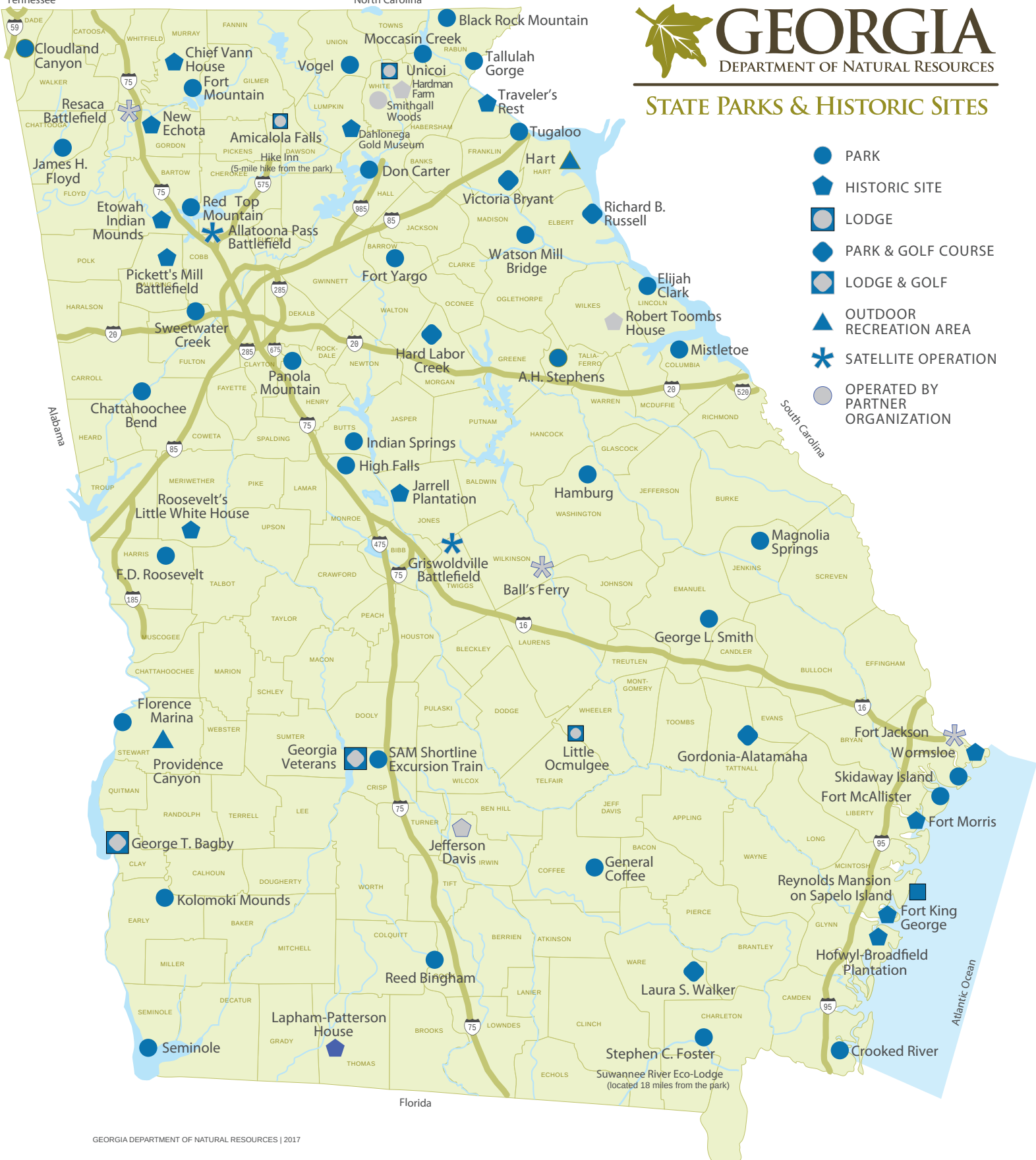
Figure 9. Looking east across a Tanyard Creek tributary in the southern portion of the project area.

Appendix 9

State Parks and Historic Sites Map



STATE PARKS & HISTORIC SITES



ATTACHMENT B

**University of Georgia Final Report Working Group
dated August 1, 2025**



UNIVERSITY OF
GEORGIA

306 Memorial Hall,
Athens, Georgia 30602
TEL 706-542-3564 | FAX 706-542-8225
askstudentaffairs@uga.edu
studentaffairs.uga.edu

Division of Student Affairs
Office of the Vice President for Student Affairs

August 1, 2025

MEMORANDUM

TO: Jere W. Morehead, President
Michelle G. Cook, Vice President for Student Affairs
Ryan A. Nesbit, Vice President for Finance and Administration

FROM: Eric Atkinson, Dean of Students 

SUBJECT: Final Report - Working Group on Future of Legion Pool/Legion Field

I am writing to provide you with the final report of the Working Group on the Future of Legion Pool/Legion Field. The working group met from February 10, 2025 to July 8, 2025 to evaluate what is in the best interests of University of Georgia students. To fulfill its charge, the group analyzed Legion Pool and Field Usage Reports, Legion Pool financial documents, a Counsilman-Hunsaker Swimming Pool Audit, a Legion Field Planning Study, and UGA Historic Resource Study. The group also toured the complex, executed a benchmarking analysis, and solicited input from student leaders and other campus units impacted in the area. Finally, to inform its evaluation, the group worked with the Tate Student Center, Office of University Architects, Office of Real Estate, and Office of Legal Affairs. Based on the analysis of student usage data, financial performance and impact on Student Activity Fee reserves, substantial capital investment needs, student leader feedback, and redevelopment concepts, we present a recommendation for the future use of the Legion Pool and Field site. The following pages present a summary of our recommendations, followed by the group's broader assessments regarding the review and evaluation.

Summary of Recommendations

Based on the findings from the reports and student feedback, it is recommended that the Legion Pool and Field site be redeveloped to better serve and support UGA's growing student population. The following actions are proposed in the best interests of the University and its students:

- We recommend closing and no longer using Legion Pool, its associated "Service Building" (i.e. the bathhouse), and Concert Stand. A Historic Resource Study that was commissioned determined Legion Pool, its pool house, and Legion Field qualify as a National Register of Historic Places-eligible complex. The Concert Stand is not historic nor considered a contributing element.
- We recommend expanding Legion Field to create a community green space for housing residents, students, and student organization use, and to construct an amphitheater using the natural topography.
- We recommend the development of additional student parking to address this critical need in the heart of campus adjacent to residence halls, Bolton Hall, the West Campus Dining, Learning, and Well-being Center, and the Tate Student Center.
- We recommend Student Affairs and the Office of University Architects continue to meet periodically to assess the student impact of community green space and implement phased renovations to test the usage of the redeveloped space before making further investments (i.e. new concert stand/performance stage, etc.).

The proposed redevelopment of the Legion Pool and Field site aims to create a more welcoming and functional space for student use and their educational, co-curricular, and extra-curricular needs. By addressing the financial challenges imposed on the Student Activity Fee reserves, student leader preferences, potential for enhanced usage of the area during the academic year, and decreased operational costs, the recommended actions will contribute to the long-term sustainability and success of the site for UGA students. At the end of this report on page 6, please see the redevelopment concept exhibit from the Legion Field Planning Study that is endorsed by the Working Group.

Summary of Findings

Usage by Students and Other Members of the UGA Community

Legion Pool has experienced a decline in visits and revenue over the past five years. Total visits decreased from 15,201 in 2019 to 10,376 in 2024. Just over 12% of total visits to the pool in FY24 were by UGA students. By comparison in the same year, 31% of visits were UGA employees and 19% were non-UGA community members and guests. The remaining 38% were children under 15 years old and campers. The six-year average shows UGA student use at only 10% of total visits to the pool. Over the past six fiscal years (2019-2024), less than 2.5% (2.42) of the total student population has visited Legion Pool, which is only open during summer months and is closed during the academic year. As of July 31, 2025, only 26 student season passes were purchased for the summer and 821 daily passes were purchased by students (11.4 average per day).

Legion Field intermittently hosts a variety of events, including those organized by student organizations and university departments, but the facility remains unused most days. There were 27 reserved events in FY24, with the six-year average being 26 events per year. The facility remains unused in its current form approximately 92% of the year.

Financial Information

Revenue, Expenses, and Resource Needs

Legion Pool has consistently operated at a net loss, with total net revenue losses amounting to \$438,644.52 from FY2019 to FY2024. This loss was fully absorbed by the Student Activity Fee reserve balance. Normal operations and reopening expenses, such as extensive prep work, painting, and repairs to equipment and infrastructure, are annually significant, reaching as high as \$94,796.31 in FY2022. Revenue from sales and service fees (i.e. season passes, concessions, etc.) has fluctuated during this same time period and has not come close to offsetting annual losses. In FY2025, Legion Pool realized a net revenue loss of \$89,910.38, which was again absorbed by the Student Activity Fee reserve balance. With continued projected reductions in the Student Activity Fee reserve balance in future fiscal years beyond FY2025, the Division of Student Affairs is challenged with continued funding constraints related to the ongoing operation of Legion Pool. To better support student success and well-being, these student fees could be utilized in several ways: by redistribution to student organizations through all-campus allocation process, by supporting basic needs initiatives for students, or by funding upgrades and additions to the Tate Student Center and other student facilities managed by the Division of Student Affairs.

Current Value and Capital Investment Needs

The University of Georgia's Office of University Architects for Facility Planning commissioned Counsilman-Hunsaker to assess the current conditions of Legion Pool and estimate capital investment needs. The Swimming Pool Audit notes that the pool is facing physical obsolescence and states, "Of foremost concern is the structural condition of the pool and facility". It is reported that the pool leaks about 3" inches per day (or approximately 24,000 gallons) and that areas of the facility would no longer be acceptable by

most current industry standards, including items required by the State of Georgia and the Clarke County Health Department. The audit identifies numerous pool, deck, and mechanical items in need of repair, replacement, and renovation and includes recommended actions in the report be considered and implemented. The itemized cost estimate of repair, replacement, and renovation items require a substantial capital investment. Additionally, Counsilman-Hunsaker estimates the cost for replacing the existing facility in its entirety at \$11,400,000.

Peer and Aspirational Institution Benchmarking

12 out of 35 peer, aspirant, and SEC universities have at least one outdoor pool accessible to the general public via memberships. Four additional SEC schools have outdoor pools, but access is limited to guests sponsored by university affiliates - effectively not open to the broader community.

All evaluated pools are managed under Campus Recreation or equivalent units, prioritizing service to students and the university community. Most public memberships include access to a full range of recreational facilities (e.g., gyms, courts, wellness centers), not just the pool. Fewer than half of the 12 public-access pools offer pool-only memberships. Students are the primary users, followed by faculty and staff. Public attendance data is limited, but student-centric usage is consistent across institutions. By comparison, Legion Pool stands out due to its organizational placement within Campus Reservations and the Tate Student Center, and its broader, more community-oriented clientele.

Legal Responsibilities or Obligations

Based on the best available evidence and after a reasonably thorough investigation, the Office of Real Estate, in consultation with the Office of Legal Affairs, believes that BOR/UGA owns the property in fee simple without restriction and that BOR/UGA has no legal obligation to continue to operate Legion Pool. This response is based on the following activities and findings:

- The Office of Real Estate hired an outside firm to conduct a title search, and the firm “did not find any requirement to maintain the pool in perpetuity or any reference to a public trust.” This firm also determined that “the Board of Regents owns the property in fee simple without restriction.”
- The Office of Real Estate reviewed Council of the City of Athens meeting minutes that included a 1952 city attorney opinion that the property (a) was “dedicated to public purposes”; (b) could only be conveyed “upon the approval of a Judge of the Superior Court”; and (c) that the American Legion would be required to use sale proceeds to “secure other facilities equal in convenience, utility and value equal to those proposed to be disposed of.” The City Council approved the ownership transfer in 1954 (subject to the 10-year operating agreement), and this approval did not reference any judicial approval of the ownership transfer nor did it reference the

American Legion securing other facilities equal in convenience, utility and value. This approval also did not reference any obligation on the part of UGA to operate Legion Pool beyond the time period contemplated in the operating agreement.

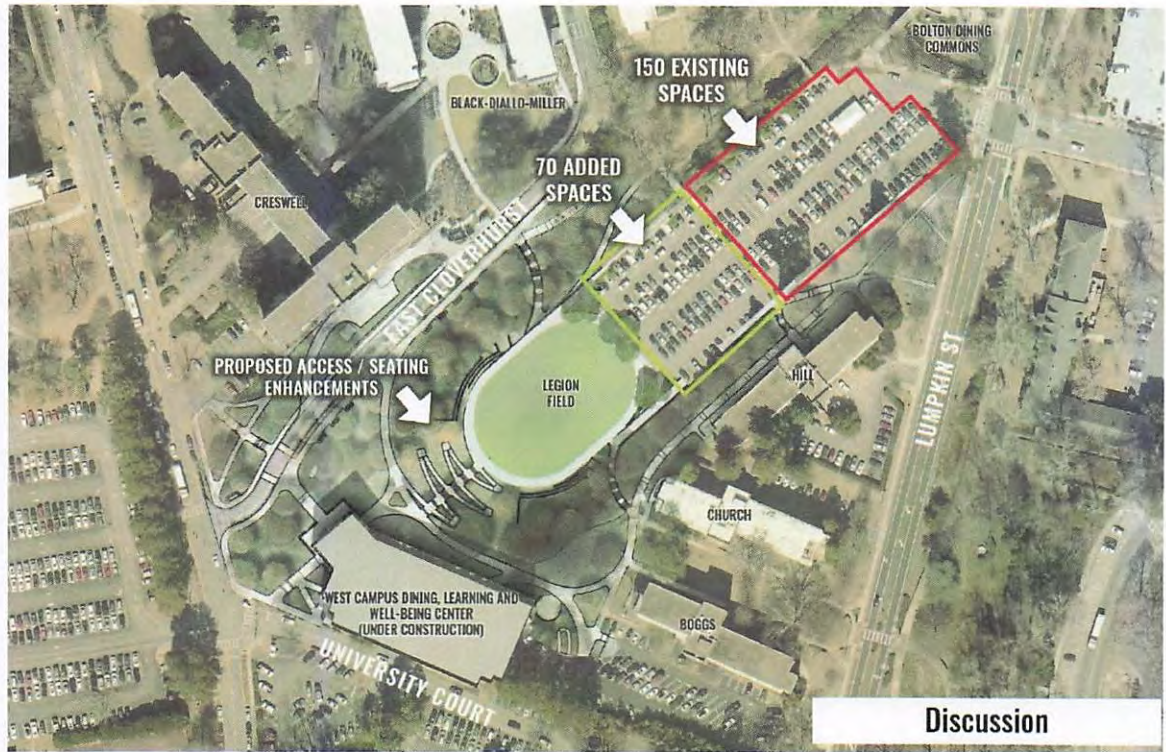
- The Office of Legal Affairs worked with the Athens-Clarke County Clerk of Court to review legal records from the early to mid-1950s and found no records of any judicial approval of the ownership transfer to UGA/BOR, no records of any lawsuits or other judicial proceedings related to the ownership transfer, and no determination of any public trust related to Legion Pool. Specifically, the Clerk of Court's Office searched records from 1950-1958 using the terms "American Legion," "Allen Fleming Jr. American Legion," and "B.F. Grant" and found no filings.
- The Office of Real Estate reviewed local newspapers from the early to mid-1950s and found multiple stories that established the internal American Legion membership dissent regarding the ownership transfer, which prolonged the disposition process (it was initially proposed in 1952) and appears to have created misinformation and misunderstandings regarding the transfer. Although these newspaper articles reference a "trust" and "trust hearing" related to Legion Pool, no legal documentation suggesting the existence of such a trust has been found despite reasonably diligent efforts.

The University of Georgia's Office of University Architects for Facility Planning also contracted with Brockington and Associates, Inc. to conduct a Historic Resource Study (HRS) of the Legion Pool complex. The study recommends that Legion Pool, its pool house, and Legion Field qualify as a National Register of Historic Places-eligible complex. The Concert Stand 'building' is not historic and the HRS states that it is not considered a contributing element.

UGA Students

Over the past six years, fewer than 2.5% of all UGA students accessed Legion Pool. While touring the Legion complex, student leaders expressed tremendous enthusiasm at the idea of refreshing and enlarging Legion Field as a community green space for the Creswell, Black-Diallo-Miller, and Hill residential communities. Green spaces such as Myers Quad and Reed Quad foster a sense of community during the academic year for residential students and are used frequently for student-led programming as well as for day-to-day outdoor study and recreation. The need for additional student parking in the heart of campus was also emphasized as a student priority. Student leaders expressed a preference for green space and additional parking over paying for maintaining or replacing the pool, which is only open during the summer months and remains closed during the academic year. The Working Group noted that students who stay in Athens during the summer often have access to and preference for more modern pool facilities in local apartment complexes.

Redevelopment Concept Exhibit



ATTACHMENT C

Georgia Historic Preservation Division Environmental Review Form Submission

Georgia Historic Preservation Division

Environmental Review Form

At a minimum, the Historic Preservation Division (HPD) requires the following information in order to review projects in accordance with applicable federal or state laws. Please note that the responsibility for preparing documentation, including items listed below, rests with the federal or state agency or its designated applicant. *HPDs ability to complete a timely project review largely depends on the quality and detail of the material submitted. If insufficient information is provided, HPD may need to request additional materials, which will prolong the review process. For complex projects, some applicants may find it advantageous to hire a preservation professional with expertise in history, architectural history and/or archaeology, who would have access to the Georgia Archaeological Site Files and an understanding of HPDs publicly available files.*

PLEASE NOTE: THERE IS A 30-DAY REVIEW PERIOD FROM THE DATE HPD RECEIVES THE SUBMITTAL. SHOULD ADDITIONAL INFORMATION BE REQUESTED, PLEASE NOTE THE 30-DAY PERIOD RESTARTS.

I. General Information

A. Project Name: Demolition of Legion Pool (UGA#2604) and Bathhouse/Pavilion (UGA#2605)

Project Address: 802 South Lumpkin Street, Athens, Georgia, 30602

City: Athens

County: Athens-Clarke

B. Federal Agency Involved: None

State Agency (if applicable): The University of Georgia

C. Agency's Involvement:

Direct/Is performing the action

D. Type of Review Requested:

Georgia Environmental Policy Act (State involvement)

State Agency Historic Property Stewardship Program/State Stewardship (State owned properties)

E. Contact Information: Applicant

Name/Title/Company: Scott Messer, Director of Renovations and Historic Preservation, Office of the University Architects

Address: 1180 E. Broad Street

City/State/Zip: Athens, Georgia, 30602

Phone: 706.542.3605

Email: crm@uga.edu

Agency Contact Info (either State or Federal, according to review type):

Name/Title/Agency: Scott Messer, Director of Renovations and Historic Preservation, Office of the University Architects

Address: 1180 E. Broad Street

City/State/Zip: Athens, Georgia, 30602

Phone: 706.542.3605

Email: crm@uga.edu

II. Project Information

A. Project Type:

Demolition

B. Project Description and Plans This should include a *detailed* scope of work, including *any* actions to be taken in relation to the project, such as all aspects of new construction, replacement/repair, demolition, ground disturbance, and all ancillary work (temporary roads, etc.), as applicable. Attach additional pages if necessary. If a detailed scope of work is not available yet, please explain and include all preliminary information:

This project seeks the demolition of Legion Pool (UGA#2604) and associated Bathhouse and Pavilions Buildings (UGA#2605) on the main campus of the University of Georgia in Athens. Following the demolition of the pool and buildings the University of Georgia will maintain ownership of the land for future redevelopment.

Per the Standard Operating Procedures outlined the University's Historic Preservation Master Plan, a Historic Resource Study was conducted by Brockington and Associates. The pool and buildings were recommended eligible for inclusion on the National Register under Criteria A and C. Likewise, the pool and building were previous determined eligible by HPD in 2012. The University concedes eligibility.

The property will continue to be owned by the University of Georgia, Redevelopment plan may include improved greenspace, an amphitheater, and expansion of the existing parking (see enclosed Final report – Working Group on Future of Legion Pool/Legion Field). However, planning is not finalized at this time.

Please refer to enclosed *Historic Resource Study: Legion Pool Complex at the University of Georgia*. Report prepared by Patricia Stalling of Brockington and Associates, June 2025.

C. Land Disturbing Activity This should include a detailed description of all horizontal and vertical ground disturbance, such as haul roads, cut or fill areas, excavations, landscaping activities, ditching, utility burial, grading, water tower construction, etc., as applicable:

Per the Standard Operating Procedures outlined the University's Historic Preservation Master Plan an archeological investigation of parcel was conducted by Nutter and Associates. No significant artifacts or resources were identified, and the survey area was noted to have undergone extensive topographic modification.

See enclosed *UGA Legion Block Letter Report* prepared by Rob Benson, RPA of Nutter and Associates, April 18, 2023.

D. Has this identical project or a related project been previously submitted to HPD for review? YES ☒ NO ☐

Previously submitted in 2012. Resubmitting to due to elapsed time, additional information and compliance with UGA Historic Preservation Master Plan.

E. Is this project also being reviewed under a tax incentive program administered through HPD? YES ☐ NO ☒

F. Is this review request in order to satisfy an application requirement, such as for a grant? YES ☐ NO ☒

**If yes, are project plans/scope of work available yet?* YES ☐ NO ☐

**If yes, please enclose a copy of the project plans/scope of work as outlined in II.B and II.C above*

III. Site Information

A. In the past this property has been used for:

- | | | |
|----------------------|----------|-------------|
| 1. Farming | YES ____ | NO <u>X</u> |
| 2. Pasture | YES ____ | NO <u>X</u> |
| 3. Mining | YES ____ | NO <u>X</u> |
| 4. Timbering | YES ____ | NO <u>X</u> |
| 5. Road construction | YES ____ | NO <u>X</u> |
| 6. Housing | YES ____ | NO <u>X</u> |
| 7. Landfill | YES ____ | NO <u>X</u> |
| 8. Commercial | YES ____ | NO <u>X</u> |
| 9. Industrial | YES ____ | NO <u>X</u> |
| 10. Other (explain): | _____ | |

B. Describe what currently exists on the property today (i.e. buildings, parking lot, house, barn, outbuildings, woods, grass, garden, etc.):

Legion Pool, Bathhouse and Pavilion

IV. Cultural Resources

Background research for previously identified properties within the project area may be undertaken at HPD, including National Register of Historic Places files, county and city surveys, and identified sites files. Additionally, research at the Georgia Archaeological Site Files (GASF) in Athens may be undertaken by a qualified archaeologist or site file staff. To make a research appointment or find contact information for GASF, please visit our website. **Please note that as part of the review process, HPD may request an archaeological survey.**

A. To your knowledge, has a cultural resources assessment or a historic resources survey been conducted in the project area? YES X NO ____ DO NOT KNOW ____ (see: <http://www.georgiashpo.org/register/survey>)

****If yes, provide the title, author, and date of the report:***

Find enclosed *Historic Resource Study: Legion Pool Complex at the University of Georgia.*
Report prepared by Patricia Stalling of Brockington and Associates, June 2025.

B. Area of Potential Effect (APE)

The APE is the geographic area or areas within which a project may cause changes (or effects). These changes can be direct (physical) or indirect (visual, noise, vibrations) effects. The APE varies with the project type and should factor in topography, vegetation, existing development, physical siting of the project, and existing/planned development. For example:

<i>If your project includes...</i>	<i>Then your APE would be...</i>
Rehabilitation, renovation, and/or demolition of a building or structure, or new construction	the building or property itself and the surrounding properties/setting with a view of the project
Road/Highway construction or improvements, streetscapes, pedestrian or bicycle facilities	the length of the project corridor and the surrounding properties/setting with a view of the project
Above ground utilities, such as siren/radio towers, water towers, pump stations, retention ponds, etc.	the area of ground disturbance and the surrounding properties/setting with a view of the project
Underground utilities	the area of ground disturbance

Based on this information, **identify the APE for your project, similar to above, and describe what exists within it** (ie. is it modern or historic residential or commercial development, undeveloped, etc. within the APE):

The pool is set low in stream valley with limited viewshed except from Cloverhurst Avenue and the adjacent residence halls. Inside the APE is Legion Pool, Legion Bathhouse and Pavilion, Legion Field, the Legion Field concert stand (1983) and associated sidewalks.

C. Is the project located within or adjacent to a National Register of Historic Places (NRHP) listed or eligible historic property or district or a locally designated property or district?

YES ___ NO ___ DO NOT KNOW X

Legion Pool is adjacent to Creswell Hall, Mell Hall, Lipscomb Hall, Hill Hall, Church Hall and Boggs Hall, all of which are classified as Category 2 (District Eligible) in the UGA Historic Preservation Master Plan. No formal Determination of Eligibility has been made for a historic district.

D. Within the project APE as identified in IV.B, are there any other buildings or structures that are 50 years old or older? YES X NO ___ DO NOT KNOW ___

Legion Pool, Legion Bathhouse and Pavilion. See enclosed Historic Resource Study.

E. Are any of the buildings or structures identified in IV.D listed or eligible for listing in the NRHP?

YES X NO ___ DO NOT KNOW ___

****If yes, please identify the properties (by name or photo #).***

F. Effects Information

1. Does the project involve the rehabilitation, renovation, relocation, demolition or addition to any building or structure that is 50 years old or older? YES X NO ___

2. Will the project take away or change anything within the apparent or existing boundary of any of these historic properties? YES X NO ___

****If yes, please explain:*** The properties are to be demolished.

3. Will the project change the view from or of any of these properties? YES X NO ___

****If yes, please explain:*** The properties are to be demolished.

4. Will the project introduce any audible or atmospheric elements to the setting of any of these historic properties (such as light, noise, or vibration pollution)? YES X NO ___

****If yes, please explain:*** Temporary noise and vibration pollution from demolition of the buildings.

5. Will the project result in a change of ownership for any historic properties? YES ___ NO X

****If yes, please explain:*** The property will continue to be owned by the University of Georgia. Redevelopment plan may include improved greenspace, an amphitheater, and expansion of the existing parking (see enclosed Final report – Working Group on Future of Legion Pool/Legion Field). However, planning is not finalized at this time

V. Required Materials (Submittal Checklist)

- ☐ Complete Environmental Review Form
 - ☐ Include all contact information as HPD will respond via email to the submitter.
- ☐ Map indicating:
 - ☐ Precise location of the project (USGS topographic map preferred: <http://www.digital-topo-maps.com/>¹).
 - ☐ In urban areas, please also include a city map that shows more detail.
 - ☐ Boundaries of the APE as noted in section II above.
- ☐ Detailed project plans to supplement section I.F, including (if applicable and available):
 - ☐ Site plans (before and after).

¹ Please note, this is not a complete list of websites with topographic map information. This website is not controlled by HPD and HPD bears no responsibility for its content.

- o Project plans.
 - o Elevations.
- ☐ High-resolution color photographs (2 photos per page) illustrating:
 - o The project area and the entire APE as defined in section IV above.
 - o Any adjacent properties that are within the APE, with clear views of buildings or structures, if applicable.
 - o If the project entails the alteration of existing historic structures, please provide **detail** photographs of existing conditions of sites, buildings, and interior areas/materials to be impacted.
 - o ****Google Streetview images will not be accepted**
- ☐ Photo key (map or project plans can be used) indicating:
 - o Location of all photographs by photo number.
 - o Direction of view for all photographs.
- ☐ Any available information concerning known or suspected archaeological resources in the APE.

*For questions regarding this form, please contact the Environmental Review Program Manager. **We are unable to accept project submittals via facsimile or e-mail.***

ATTACHMENT D

**Letter from Georgia Department of Community Affairs,
Deputy State Historic Preservation Officer,
SP-251001-001, October 23, 2025**



**GEORGIA DEPARTMENT
of COMMUNITY AFFAIRS**

October 23, 2025

Scott Messer
Director of Renovations & Historic Preservation
Office of the University Architects
University of Georgia
1180 East Broad Street
Athens, Georgia 30602

**RE: UGA: Demolish Legion Pool and Bathhouse/Pavilion, 802 South Lumpkin Street, Athens
Clarke County, Georgia
SP-251001-001**

Dear Mr. Messer:

The Historic Preservation Division (HPD) has received the information submitted concerning the above referenced project, including the report entitled, *Historic Resource Study: Legion Pool Complex at the University of Georgia, Athens, Clarke County*, prepared by Brockington and Associates, Inc. and dated June 2025, and the memorandum entitled, *Archaeological Survey of the West Precinct Legion Block*, prepared by Nutter + Associates, Inc. and dated April 18, 2023. Our comments are advisory and offered to assist the Georgia Board of Regents (BOR) and University of Georgia (UGA) in determining if the agency's actions constitute a significant impact to the quality of the environment in order to complete an Environmental Effects Report (EER) as defined by the Georgia Environmental Policy Act (GEPA; O.C.G.A. 12-16-4) and/or in compliance with the State Agency Historic Property Stewardship Program (State Stewardship; O.C.G.A. 12-3-55) and are offered to assist the UGA in following the standard operating procedures (SOP) outlined in the UGA *Historic Preservation Master Plan* (HPMP). HPD's role under GEPA/State Stewardship is to provide advisory comments on the agency's proposed action as it relates to historic properties. This letter provides evidence of initial consultation with our office in accordance with the provisions outlined in GEPA/State Stewardship and the UGA HPMP.

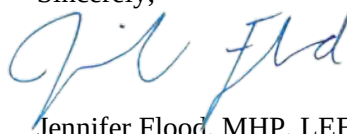
The subject project consists of demolishing the circa (ca.) 1936 Legion Pool, Legion Pool Service Building, also known as the Legion Pool House/Bathhouse and UGA Building 2605/2638, Legion Pool Pavilion/UGA Building 2605, and the ca. 1983 concert stand all located within the Legion Pool Landscape Character Area/No. 14 on the UGA campus at 802 South Lumpkin Street in Athens in order to expand the adjacent Legion Field and construct a community green space, amphitheater, and additional student parking. Based on the information provided and in accordance with SOP 10 of the HPMP, HPD concurs that the Legion Pool Landscape Character Area/No. 14 is eligible for listing in the Georgia/National Register of Historic Places (G/NRHP) and that Legion Pool, the associated service building/bathhouse, and pavilion contribute to the eligible character area and are considered UGA Category 2 buildings per the HPMP. HPD also concurs that the concert stand does not contribute to the G/NRHP-eligible Legion Pool Landscape Character Area/No. 14, due to age. As such, in accordance with SOP 11 of the HPMP, it is HPD's opinion that the subject project will have a significant impact on historic properties that are eligible for listing in the G/NRHP. The demolition of UGA Category 2 elements/contributing resources within a G/NRHP-eligible property is not consistent with the State of Georgia's *Standards for the Treatment of Historic Properties*.



HPD notes that for a demolition project deemed to have a significant impact as outlined in SOP 12, scheduling a public meeting in accordance with SOP 14 may be prudent regardless of the EER publication date. If UGA decides additional discussion of the project or the provided comments is warranted, including discussion of appropriate mitigation to address the significant impact, in accordance with SOP 13 of the HPMP, HPD is available for technical assistance consultation. Furthermore, please note that if a federal agency becomes involved in this project through a permitting process, loan guarantee, grant, or other mechanism, consultation will be required under Section 106 of the National Historic Preservation Act of 1966, as amended.

Please refer to project number **SP-251001-001** in any future correspondence regarding this project. If we may be of further assistance, please contact Stacy Rieke, Environmental Review Program Manager, at Stacy.Rieke@dca.ga.gov or (470) 522-7979 or Noah Bryant, Compliance Review Archaeologist, at Noah.Bryant@dca.ga.gov or (404) 679-0649.

Sincerely,

A handwritten signature in blue ink, appearing to read 'J. Flood', is positioned above the printed name.

Jennifer Flood, MHP, LEED Green Associate
Division Director
Deputy State Historic Preservation Officer

JAF/smr

cc: Elissa Ryan, Georgia Board of Regents
Maggie Discher, UGA
Jody Graichen, Northeast Georgia Regional Commission
Beth Eavenson, DCA Regional Services, Region 5

ATTACHMENT E

**Historic Resource Study: Legion Pool Complex at the University
of Georgia prepared by Brockington Consulting, June 2025**



UNIVERSITY OF GEORGIA

Historic Resource Study: Legion Pool Complex at the University of Georgia

Athens, Clarke County, Georgia



June 2025

Prepared for:

The University of Georgia
Office of University Architects for Facilities Planning

Historic Resource Study: Legion Pool Complex at the University of Georgia

Athens, Clarke County, Georgia

June 2025

Prepared for:

The University of Georgia
Office of University Architects for Facilities Planning

Prepared by:

A handwritten signature in black ink, reading "F. Patricia Stallings". The signature is written in a cursive style with a large, stylized "F" and "P".

Patricia Stallings
Senior Historian

Brockington and Associates, Inc.
Atlanta • Charleston • Savannah

Executive Summary

In April 2025, the University of Georgia (UGA) Office of University Architects for Facilities Planning contracted Brockington and Associates, Inc. (Brockington) to conduct a Historic Resource Study (HRS) of Legion Pool, associated buildings (UGA Buildings #2605 and 2638), and Legion Field. The complex is located at 802 South Lumpkin Street in the northern portion of the UGA campus in Athens, Clarke County, Georgia. The HRS is designed to help the University fulfill its goals to identify, evaluate, and document historic resources on its campuses and other properties. This documentation is being prepared as a due diligence effort to support the ongoing and future management of the complex. Project activities included archival research, a site visit to inspect the architectural features of the complex, high-resolution digital photography, evaluation of the features, and report preparation.

Legion Pool, its bathhouse, and Legion Field were part of a recreational complex first envisioned by the Athens American Legion post during the early 1930s. Completed between 1935 and 1936, the pool complex was funded through a cooperative effort between the American Legion, the City of Athens, and local citizens as well as New Deal monies obtained through the Works Progress Administration (WPA). The pool was transferred to UGA in the 1950s, but it continued as a public recreational asset even after the City of Athens ceded management in the mid-1970s. The associated Legion Field, which was always used for recreational purposes, also gained popularity with the UGA student body during the 1970s when it was frequently used for sponsored musical and other events. The bathhouse (Building #2605), completed in 1936, was designed by local architect C. Wilmer Henry and reflected the Colonial Revival style of architecture.

The Georgia State Historic Preservation Office (SHPO) previously determined that Legion Pool and its associated “Service Building” (i.e., the bathhouse) were eligible for the National Register of Historic Places (NRHP). Archival research conducted for the project confirmed that the Legion Pool complex possesses significant associations under Criterion A (*events*) at the local level in the areas of recreation, entertainment, and social history. Under Criterion C (*architecture*), while the pool and its bathhouse have lost some degree of integrity in terms of material changes, collectively they retain sufficient architectural integrity to express their period and type of construction. The bathhouse retains certain key features, including the brick cladding, the overall one-story linear form, most of its gabled roofline, the recessed entry, the rear wall brick detailing, and the perpendicular, open pavilion. Legion Pool retains its overall dimensions (width, length, and depth) and spatial relationship with the bathhouse and the pavilion. Legion Field still reflects the defining open space that was used by the public as part of the recreational grounds, as well as by the student body for concerts and football events. The non-historic concert stand, built in 1983, is not considered a contributing element, nor are certain non-historic landscape elements around the field, including the sidewalk and the stone wall.

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1.0 Project Overview

On April 23, 2025, Brockington and Associates, Inc. (Brockington) conducted a Historic Resource Study (HRS) of the c1935 Legion Pool, its associated buildings (UGA Buildings #2605 and 2638), and Legion Field at the University of Georgia (UGA). The complex is located at 802 South Lumpkin Street, in the northern portion of the UGA campus in Athens, Clarke County, Georgia (Figures 1.1 through 1.8). The HRS is designed to help the University fulfill its goals to identify, evaluate, and document historic resources on its campuses and other properties.

The site visit consisted of physically inspecting the exterior and interior of the pool building, the pool itself, and the surrounding landscape, which also includes Legion Field, and a non-historic concert stand. High-resolution digital photographs were taken of the buildings, and notes were made as to materials, design, and any obvious physical alterations. Our archival research began with a review of the digitized collection of the campus newspaper, *The Red and Black*, which includes searchable copies dating to the late nineteenth century. We also reviewed materials at UGA's Hargrett Rare Book and Manuscript Library, including campus plans, annuals, newspaper clippings, historic photographs, and additional campus publications. Collections at the Athens-Clarke County Library were reviewed, as well as architectural plans available through the UGA Facilities Management Division Facilities Inventory.

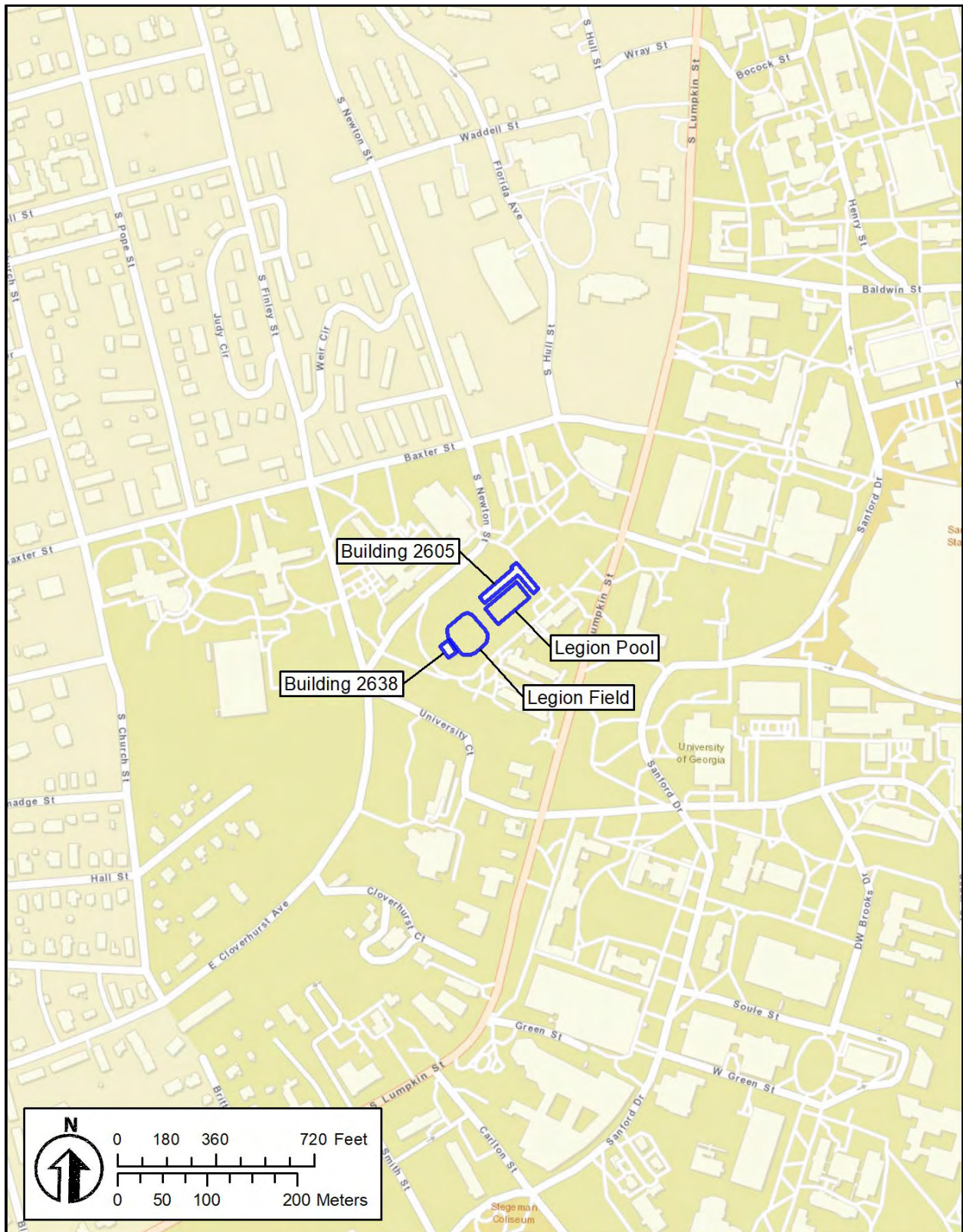


Figure 1.1 Location of Legion Pool and associated buildings.

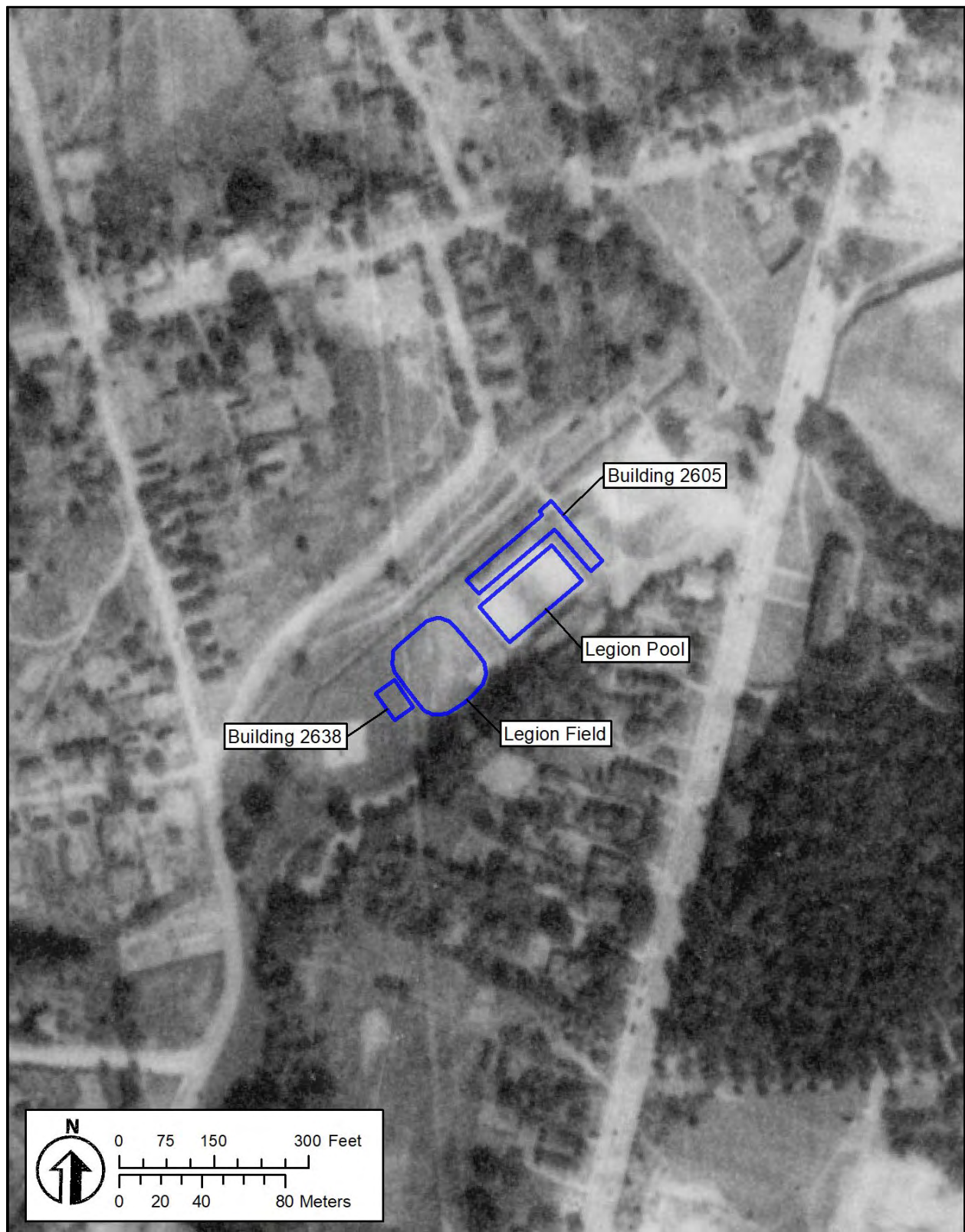


Figure 1.2 Legion Pool and associated resources on a 1938 aerial map. Note: aerial shows future location of Building 2638.

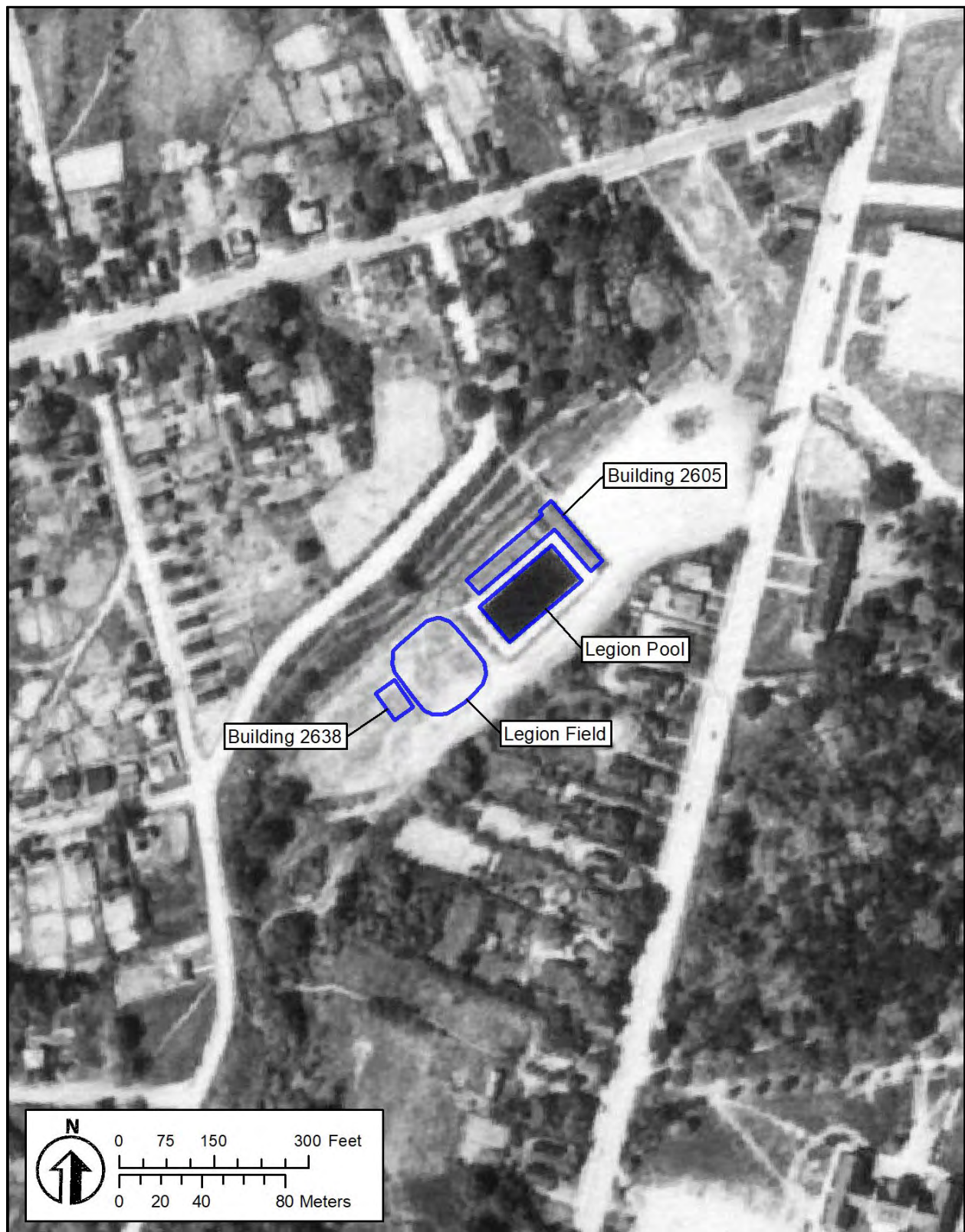


Figure 1.3 Legion Pool and associated resources on a 1944 aerial map. Note: aerial shows future location of Building 2638.

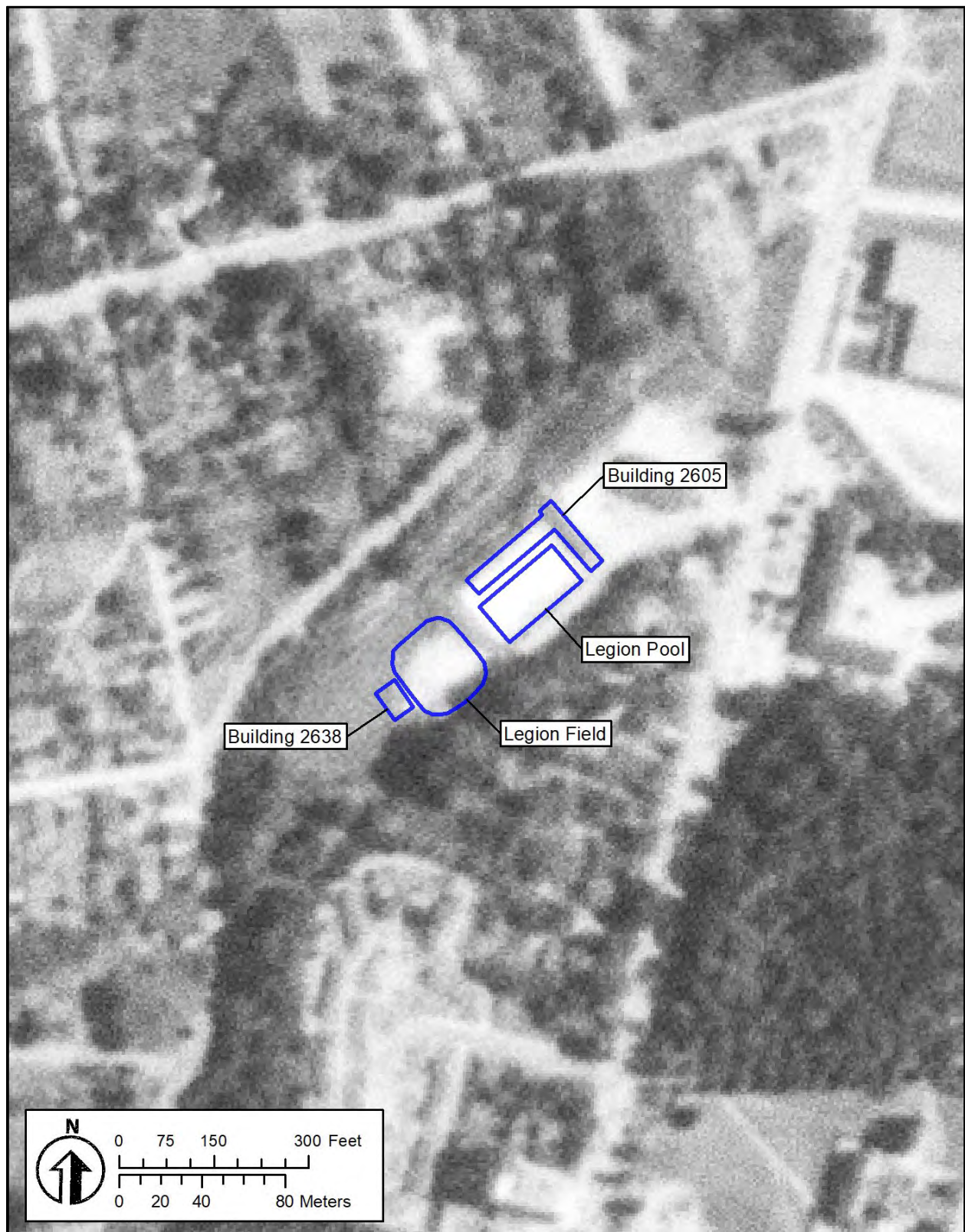


Figure 1.4 Legion Pool and associated resources on a 1951 aerial map. Note: aerial shows future location of Building 2638.

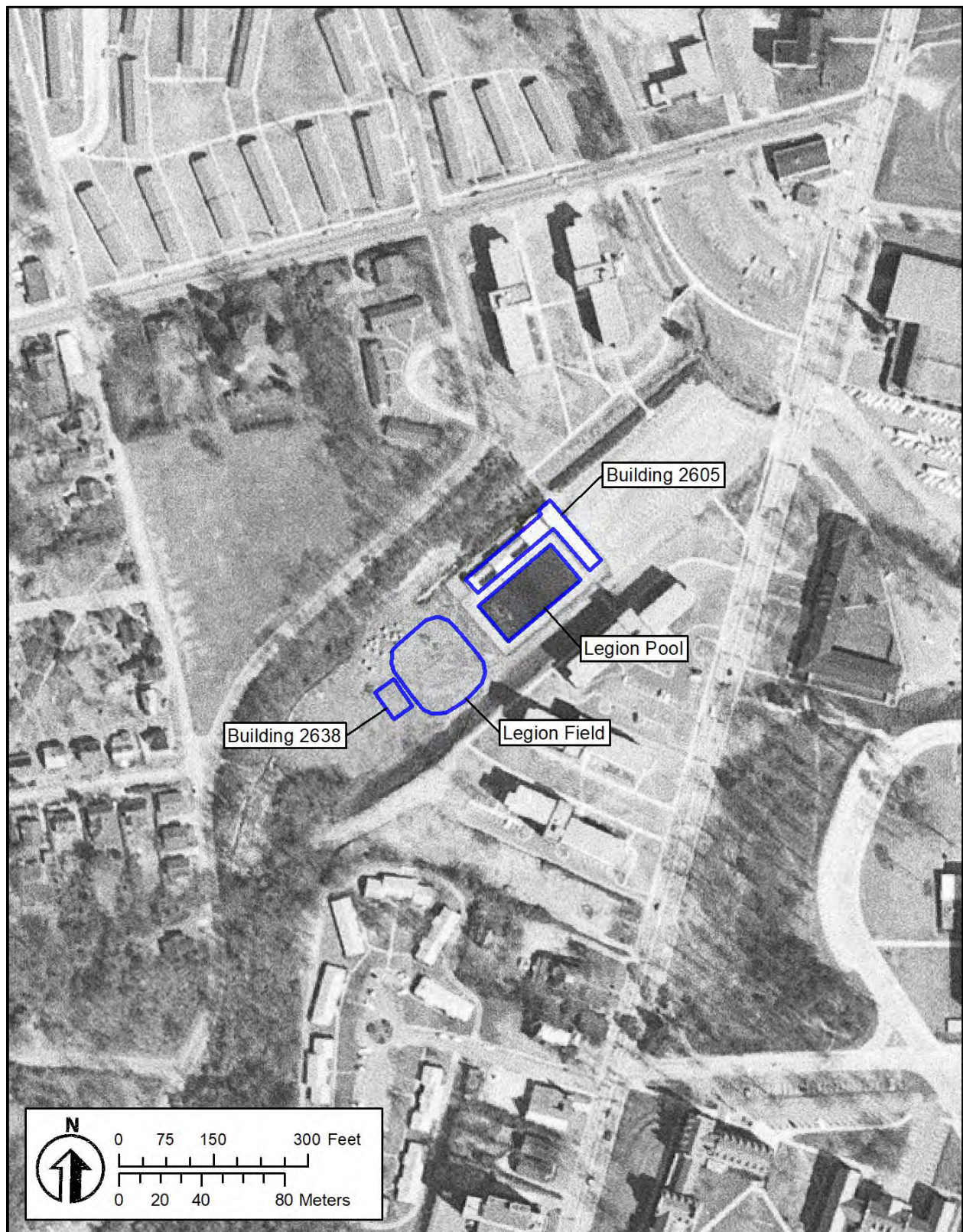


Figure 1.5 Legion Pool and associated resources on a 1962 aerial map. Note: aerial shows future location of Building 2638. Also, by this time, the old Legion log cabin, northeast of the bathhouse, had been demolished.

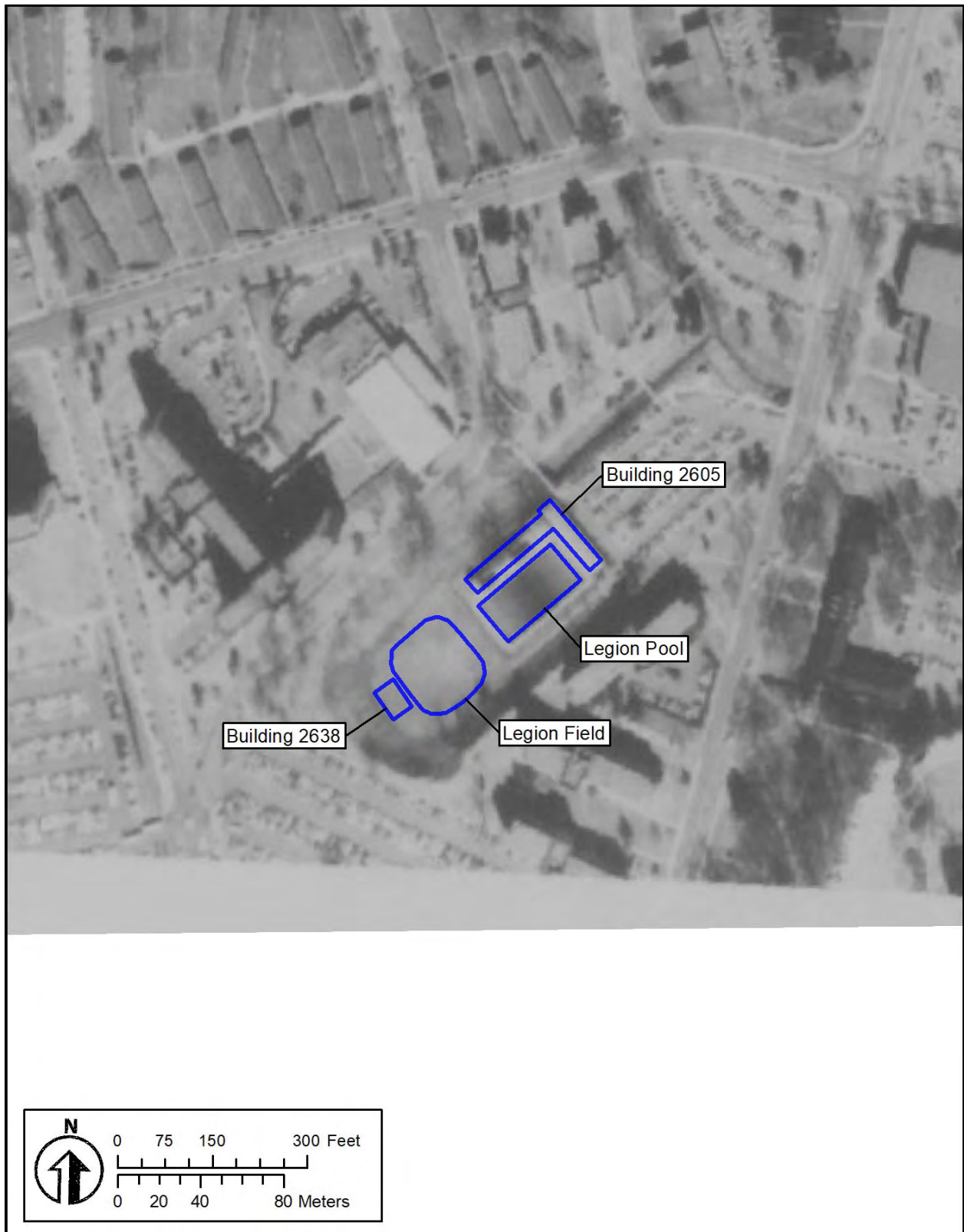


Figure 1.6 Legion Pool and associated resources on a 1973 aerial map. Note: aerial shows future location of Building 2638.

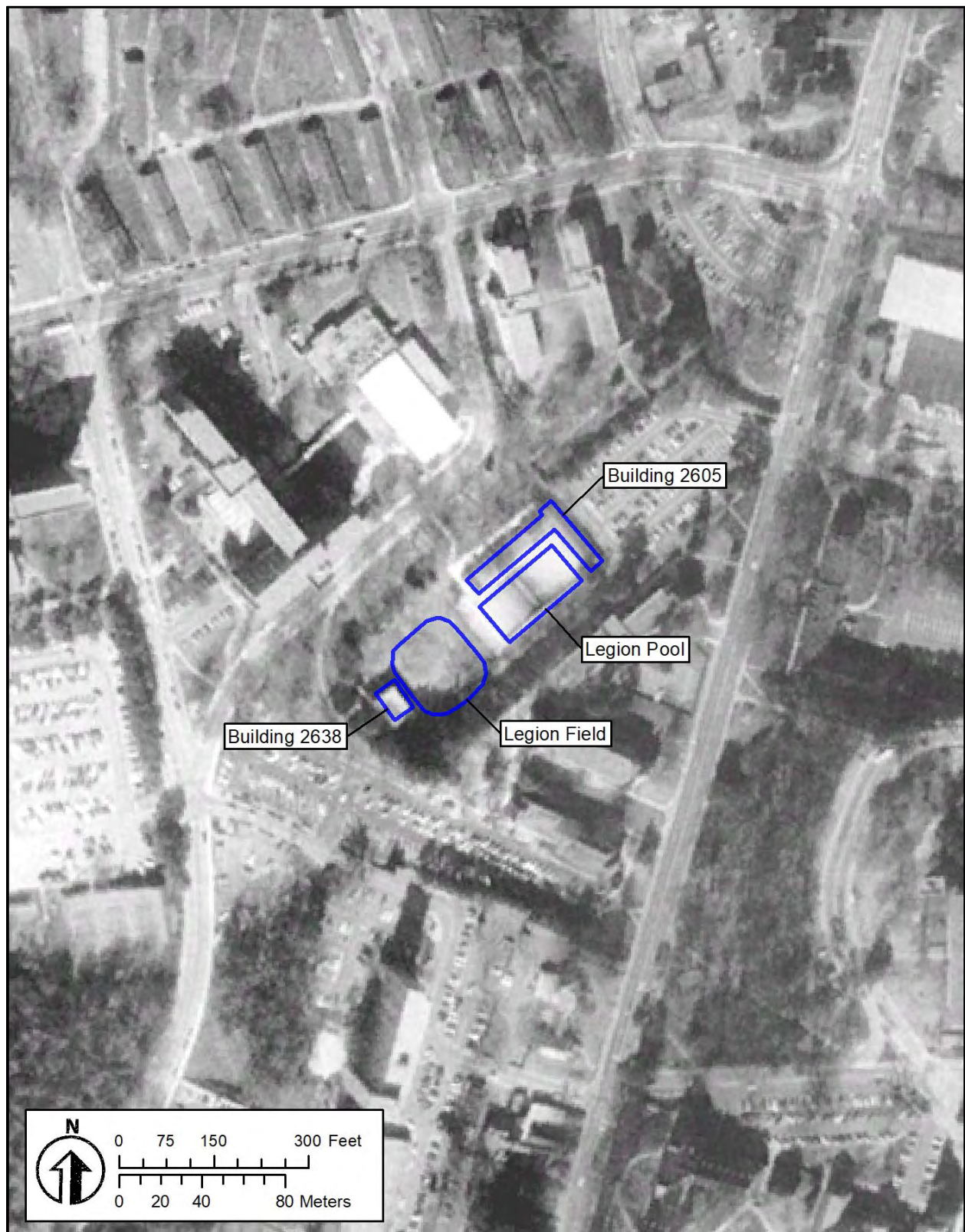


Figure 1.7 Legion Pool and associated resources on a 1993 aerial map.

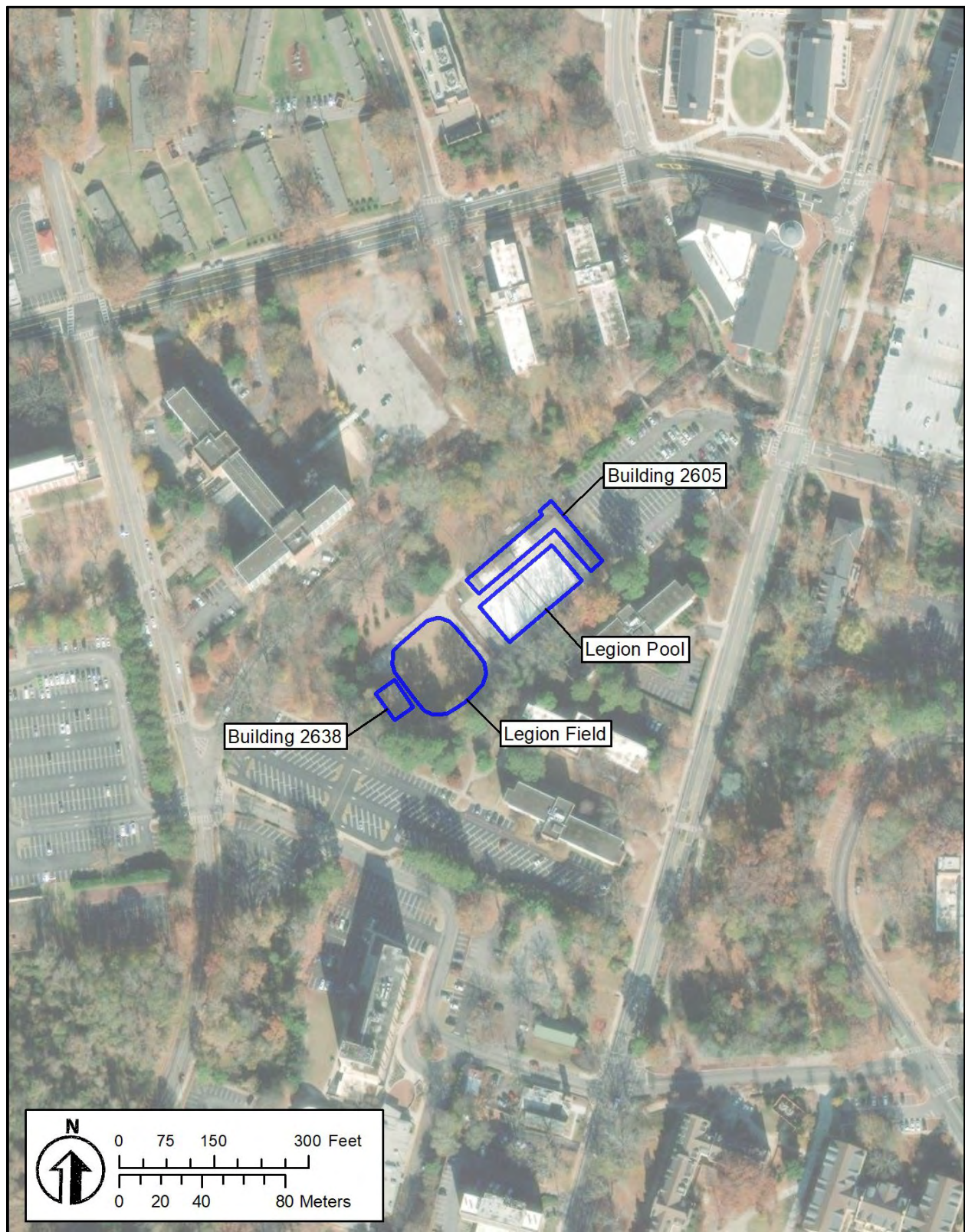


Figure 1.8 Legion Pool and associated resources on a 2025 aerial map.

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2.0 Historic Context

2.1 The American Legion Sponsors Public Works

The American Legion was established in Europe in March 1919 by American soldiers as they awaited demobilization from World War I. Many of the founders were officers who had witnessed “deficiencies in defense, citizenship, and education” of the troops during the conflict. Immediately after the war, they also soon discovered that the United States was ill-equipped to support the mass of returning veterans, particularly those that were disabled or unemployed. Since its founding, the American Legion has campaigned and lobbied on behalf of veterans, provided key support in the establishment of the Veterans Administration (VA) and the GI Bill, assisted veterans in finding employment, and supported and developed medical studies such as those for Post Traumatic Stress Disorder (PTSD) and exposure to toxins in combat zones. In addition, the Legion has also supported local community programs. In 1923, the Legion established a Community and Civic Betterment Bureau “to help municipalities build and improve parks, playgrounds, health-care facilities, swimming pools, schools and theaters throughout the United States” (American Legion 2025).

These community projects were largely sponsored by local individual Legion posts. Articles in *American Legion Weekly* indicate that various public works, including swimming pools, were sponsored across the country during 1920s. In Georgia, historic newspapers indicate the first American Legion swimming pool was likely at Dawson (Terrell County) in 1922. Others were constructed in Buford (1927), Barnesville (1927), Fort Valley (c1930), and potentially Columbus (c1928). In Athens, the Allen R. Fleming, Jr. American Legion Post (#20) had been established in 1919 with 60 charter members and, by 1930, had become one of the largest posts in the State of Georgia with 21 standing service committees. In addition to its obligations to veterans, their widows, and orphans, the Athens post promoted parks and playgrounds, sponsored a local Boy Scout troop, and supported a junior baseball team (*Athens Banner-Herald* June 29, 1930).

2.2 Construction and Early History of Legion Pool

According to one source, the local post may have begun its swimming pool campaign sometime during the 1920s (Save Legion Pool 2025), but the most substantial work came in the 1930s. By 1933, the Athens American Legion post had purchased an 8-acre tract off South Lumpkin Street, known as the “old waterworks property,” for a modern swimming pool and other recreational amenities (*Athens Banner Herald* September 3, 1933). In September of that year, the Athens City Council approved a resolution supporting the Legion’s plans, stating it would be “of great value to this city and community and will give our people a place of opportunity to enjoy social activities,” and called on other civic organizations to also support the project (*Athens Banner Herald* September 3, 1933).

The pool site’s topography created a “natural bowl” that facilitated grading and construction, but it also required the rerouting of Tanyard Branch, which flowed through the property. Athens tile contractor Charlie Conterio supervised the pool’s construction, which began in 1934 (Doster 2002). However, additional funding was required to complete all the amenities, including the tiling, bathhouse, and landscaping. During the 1930s, the federal government’s “New Deal” benefited such community public works projects with supplemental funding. In 1934, the Federal Emergency Relief Administration (FERA) offered \$18,000 to support completion of the Athens pool project, provided the Legion and local community pledged \$12,500. The Legion hosted a “steak and chicken supper” at the construction site, where they solicited funding and ideas from the city and local bankers (*Athens Banner Herald* June 22, 1934).

According to one article, at some time during the funding process, the American Legion officially transferred the land to the City of Athens “in order to obtain” the funding from the Works Progress Administration (WPA) and Public Works Administration (PWA) (*Athens Banner Herald* September 21, 1952).

Even in the midst of the Great Depression, the City of Athens slowly but successfully raised the additional money through various events. In June 1934, the American Legion sponsored a barbeque, and sent out over 200 tickets to citizens, requesting the purchase of a ticket for \$1.00 each (*Athens Banner Herald* June 11, 1934). The Legion even proposed hosting a boxing match and a “crazy politics event” to raise funds (*Athens Banner Herald* October 21, 1934; March 25, 1935). One local sixth grade class held a “rummage sale,” and donated five dollars (*Athens Banner Herald* April 21, 1935). The various fundraising efforts worked and by July 1935, President Franklin D. Roosevelt’s administration announced the approval of public works funding for two Athens projects: the Legion’s pool and the local airport (*Athens Banner Herald* July 3, 1935).

While construction work on the supporting buildings and landscaping remained incomplete, Legion Pool itself opened in July 1935. At 150 feet long by 75 feet wide, and depths ranging from 2.5 to 9 feet, it was the largest public pool between “Richmond and Miami” (Doster 2002). Temporary lights were installed to allow swimming at night, temporary bath houses were erected while construction of the permanent structures continued, and a “regulation” diving board was officially installed at the end of July (*Athens Banner Herald* July 16, 1935; July 28, 1935).

The new pool was also equipped with a \$5,500 filter plant, “one of the most complete filter systems in America” (*Athens Banner Herald* July 16, 1935). Designed by the International Filter Company of Chicago and constructed by J.F. Cole, the plant included three modern 200-gallon tanks, as well as the latest type of chlorinators and amoniators. A combination of both chlorine and ammonia were thought to be a “more effective germ killer” than the individual chemicals and they were thought to be “less injurious to the eyes and nasal membranes.” The pool also included a modern vacuum system that allowed cleaning without draining the water (*Athens Banner Herald* July 16, 1935).

The new facility was immediately popular with local citizens. The American Legion charged nominal admission fees (25 cents for adults and 10 cents for children), but children under 17 were allowed free admittance on Monday and Tuesday mornings. “Smiles were on every face as the children dived, swam, and played around,” noted one news reporter. “One little chap was noticed splashing around in abbreviated short overall pants. He, too, was having a fine time” (*Athens Banner Herald* July 16, 1935). The Legion also sponsored free (upon paid admittance) life-saving lessons, taught by lifeguard Ben Yow (*Athens Banner Herald* July 16, 1935). Patrons could also purchase tickets with special rates at local stores and get \$1.50 worth of swimming for only \$1.00 (*Athens Banner Herald* July 21, 1935).

Finalization of the pool and its associated amenities continued into the Spring of 1936. In April, laborers began laying tile with the goal of completing the project by the last weekend of June, when the state American Legion convention would be held in Athens (*Athens Banner Herald* April 19, 1936). By the end of May, the pool opened for the season. The playground, and men’s and women’s bathhouses (designed by C. Wilmer Heery of Atlanta), were also nearing completion (*Athens Banner Herald* May 31, 1936; June 7, 1936).

C. Wilmer Heery, a resident of Athens and a 1926 graduate of Georgia Tech, trained “in the neo-classical tradition of the French École des Beaux Arts” (Brookwood Group 2025). Heery apprenticed to several Atlanta architectural firms after his graduation, but new construction demand dropped at the onset

of the Great Depression. Heery and his family moved to Athens at the request of UGA professor Rudy Driftmier, who led much of the university's building program during the 1930s. Officially licensed as an architect in 1933, Heery worked as a staff architect until he was appointed Chief Architect of the Atlanta office of the newly established Federal Housing Administration (FHA), and moved with his family in Atlanta. He returned to Athens (his wife was an Athens native) again after World War II, opened an office, and later established Heery & Heery Architects with his son George, with offices in Athens and Atlanta (Brookwood Organization 2025).

Historic photographs (Figures 2.1 through 2.3) show the bathhouse largely retaining the same footprint as today, except it was unpainted and the roofs above the showers and toilets had a raised gable with open sides, likely for ventilation. Windows were wood-framed 12-light units, and the far end wings featured doors capped with flared covers and latticework-type supports. Historic aerials suggest the original construction included a grandstand on the southeast side of the field, but these were demolished by the 1940s. The pavilion on the east side of the pool appears to have been detached from the main bathhouse, although there appears to be a covered entry area between the two.

The Legion also constructed a log cabin (see Figure 2.2) or meeting house to the east of the pool that could be used by both the Legion and other community organizations, such as the Boy Scouts. The cabin was completed by 1934 and officially dedicated in March 1935. The cabin, located on the north side of the present-day Legion Pool parking lot, was actually the first piece of the "community center," which included the pool, playground, and other amenities (*Athens Banner-Herald* March 31, 1935). Based on historic aerials, the cabin, later referred to as the "Legion Hut" (see Figure 2.4) was demolished c1960.

The pool formally opened on June 7, 1936, with a reported 2,000 people in attendance. State WPA administrator Miss Gay B. Shepperson, the featured speaker, said the pool was "a perfect example of what President Roosevelt meant...when he said the Federal government could solve the unemployment problem by putting men to work on projects that would be of a lasting nature" (*Athens Banner Herald* June 8, 1936). The ceremonies included exhibitions by 1924 and 1928 Olympic swimmer H.S. Glancy, who demonstrated several swimming styles. Two comic divers from Atlanta, Jack Deacon and Ed Tylee, performed in "old maid's clothes" and "kept the huge crowd in an uproar." Additional demonstrations included local swimmers Miss Dorothy Philpot, Goodloe Erwin, Billy Peebles, and Albert Weir. UGA was represented by swimmers Asa Candler, William Alexander, and Miss Amy Slocum (*Athens Banner Herald* June 8, 1936).

Following its completion, Legion Pool hosted swimming competitions for the Southeastern Amateur Athletic Union as well as local high school groups. The pool hosted community-open events for bathing suit reviews and music. In 1938, the Legion sold "season tickets" (\$5.00 for adults and \$3.00 for children), which allowed one swim daily, and also offered monthly ticket or coupon books. The poolside "canteen" offered soft drinks, crackers, and cigarettes in the "main office in the northern part of the building," instead of the previous sales area at the south end of the pavilion (*Athens Banner-Herald* May 31, 1938).

During World War II, the pool was offered to UGA's Naval cadets as part of their physical fitness training (*Red and Black* July 13, 2023). Training generally took place during the week, leaving weekends for public access. Cadets were also able to use the "well-furnished post home, in a big log cabin" on site, which included games, magazines, and books. The grounds were transformed with shuffleboard and horseshoe courts, and dances were held beneath the pavilion. The Navy's use of the pool continued until 1944, when UGA constructed a new pool on campus (American Legion 1942, 2021).

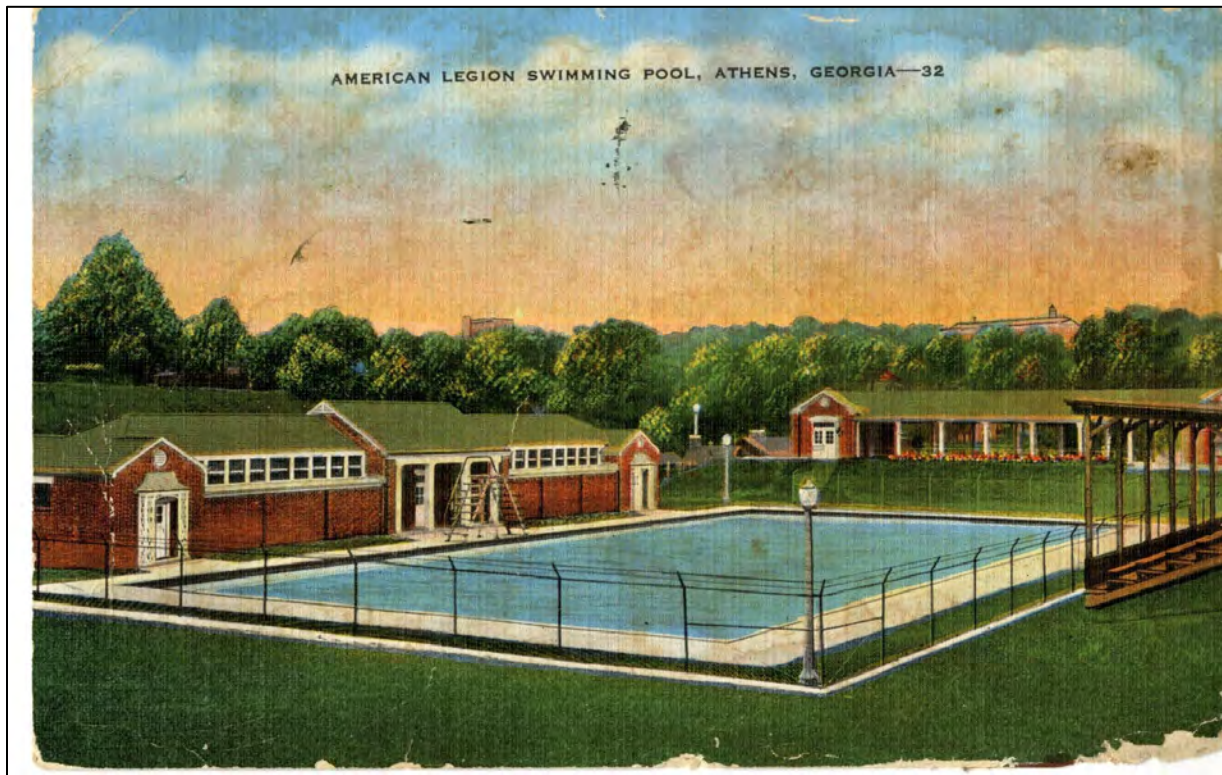


Figure 2.1 Postcard view of Legion Pool, undated. However, the pavilion design does not align with the 1942 photograph in Figure 2.2 (provided by UGA Office of Architects).

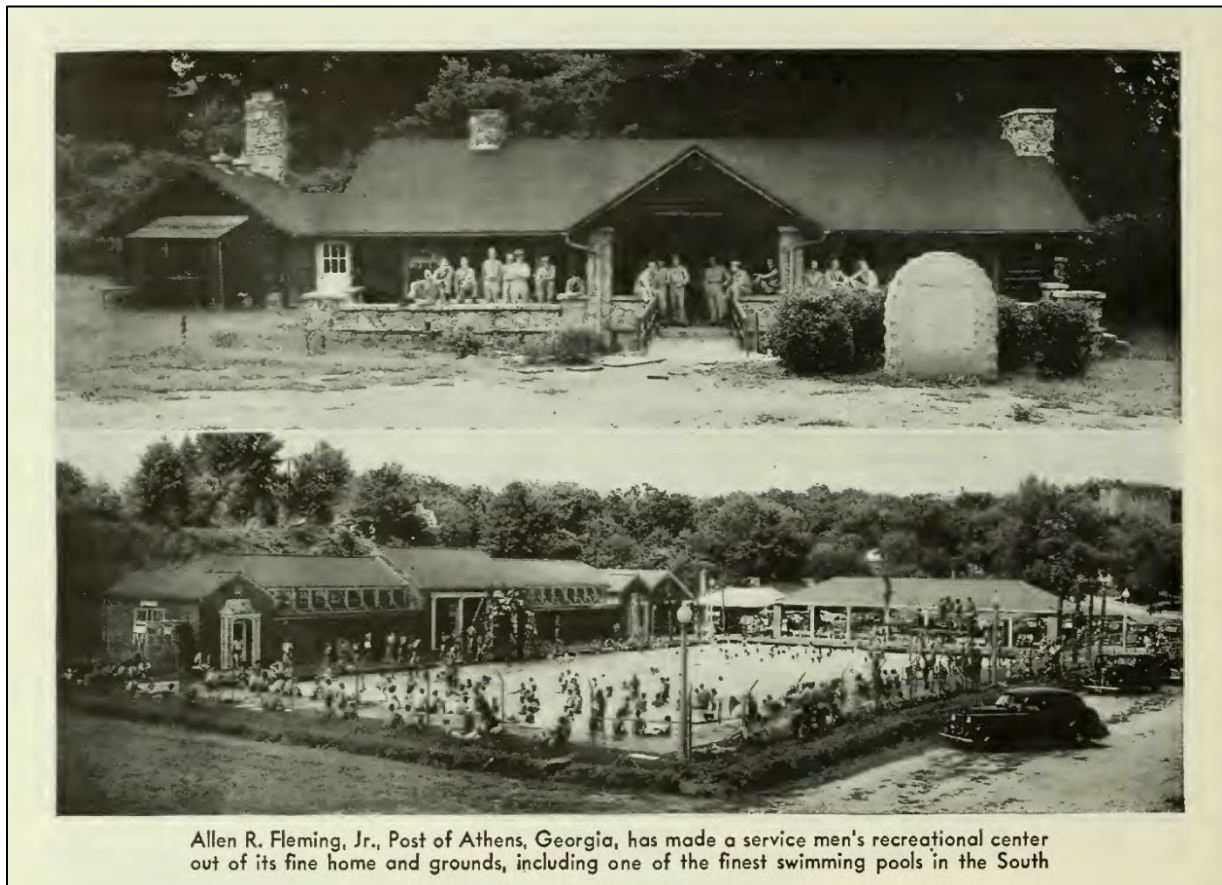


Figure 2.2 World War II-era photograph of the pool (bottom) and log cabin (top, not extant) (American Legion 1942).



Figure 2.3 Swimmers at Legion Pool, 1949. This is the northern corner of the pool near the current concession stand (*Athens Banner-Herald* May 15, 1949).

2.3 UGA Stewardship

In May 1952, the Athens American Legion post voted to support the city in selling the pool property, which included the pool, dressing rooms, pavilion, and the Legion log cabin, to UGA for its own recreational uses for \$75,000. The Athens City Council took the matter into consideration later that year in September, but because the property was originally dedicated for “public use,” any conveyance would need to account for that use. There were also outstanding questions regarding the American Legion’s “private interest” in a portion of the property (City of Athens, Mayor and Council Minutes 1952). The proposition was not without controversy, with local citizens objecting to the University essentially commandeering a public source of recreation (*Athens Banner Herald* September 21, 1952). In 1954, the City deeded the property to the University System of Georgia Regents, although the deed stipulated the City would continue to operate the pool under a lease agreement for 10 years, with another 10-year option. The deed allowed for joint use of the property, except from May 15 to September 15, when the City of Athens would be granted “exclusive use” of the swimming pool, bathhouse facilities, and playground area. The agreement also obligated the City to maintain and operate those same amenities (Clarke County Deed Book [CCDB] 143:18). In 1961, with the enrollment of the first two African American students (Charlayne Hunter-Gault and Hamilton Holmes), UGA desegregated. This also meant the official desegregation of Legion Pool (*Red and Black* July 13, 2023).

During the 1950s through 1980s, concurrent to the pool's continued use, adjacent Legion Field (Figures 2.5 through 2.8) also became a popular recreational area for UGA's student body, which arranged a host of events. During the 1950s, the recreational area appears to have been most popular for intramural sports events. However, beginning in the 1960s and through the 1980s, the field saw more widespread use and, with its surrounding grassed hillsides, provided a natural amphitheater atmosphere. Concerts, pep rallies, tailgate parties, class parties, and even poetry readings and children's television characters were scheduled at the grass field.

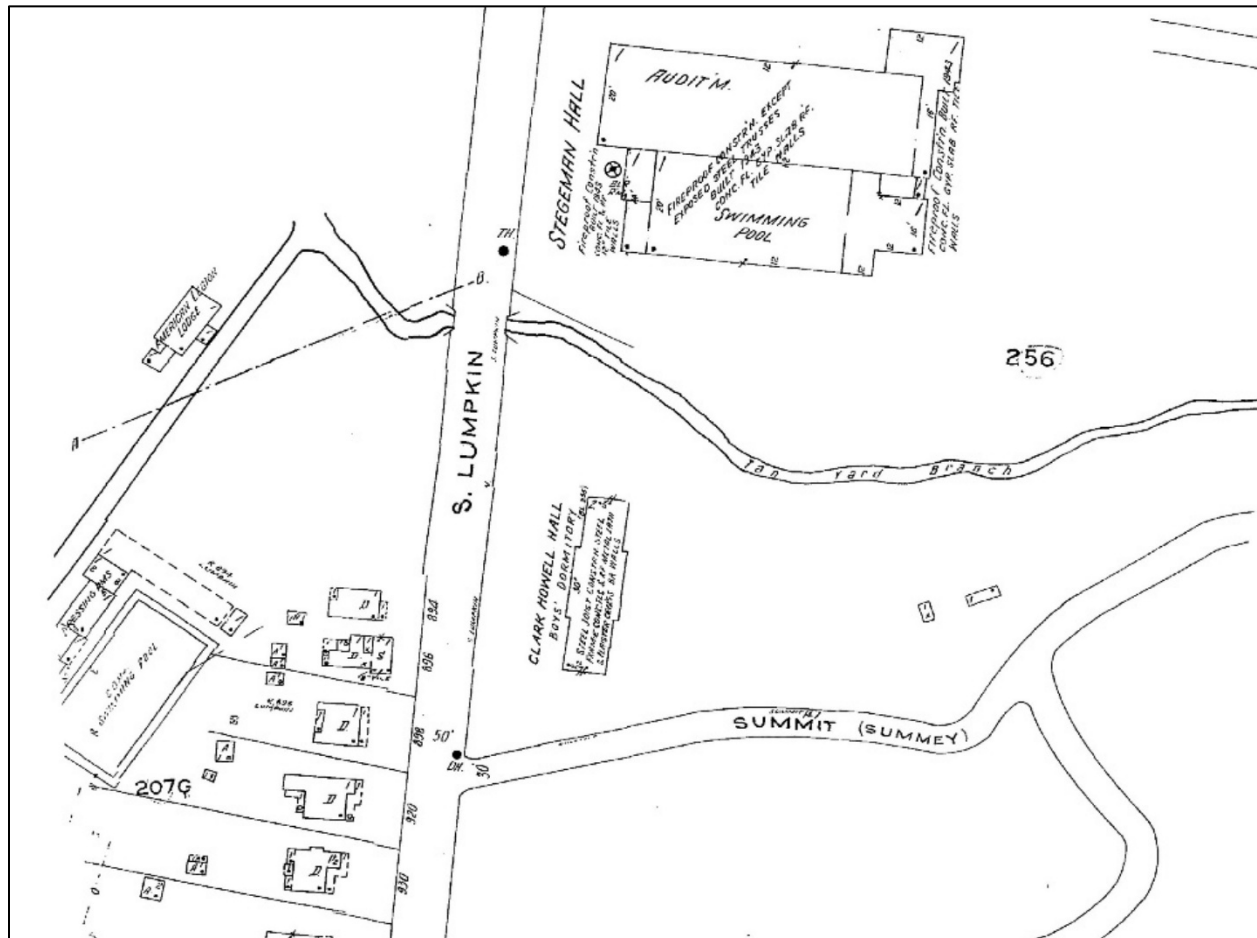


Figure 2.4 Portion of a 1950 Sanborn map showing the pool (far left) and the American Legion Lodge building (upper left). Copy of Sanborn map provided by the Athens-Clarke County Planning Department.

Athens had a vibrant music scene at this time and so, by the 1970s, the field was particularly popular for concerts, which included the Goose Creek Symphony, Bonnie Raitt, Vassar Clements, the B-52s, Gatemouth Brown, R.E.M, and many others. The concerts were not without controversy and were sometimes met with noise and crowd complaints (*Red and Black* May 9, 1972; July 10, 1980, April 24, 1985). Before one concert, University police even arrested Doug Kershaw's (the "Ragin' Cajun") road manager for public indecency (sunbathing nude), although he managed to post bail before the music began (*Red and Black* April 24, 1975).

In 1972, one rowdy festival featured the Athens group Labyrinth (replacing Macon's Wet Willie at the last minute), Some Rise, Melton & Laughing Disaster, and the night's headliner Goose Creek. The student paper stated that by dark, "The Legion area looked like Little Byron or something...replete with dogs,

blankets, and refreshments.” Goose Creek continued playing until nearly 11:00 p.m. when security personnel nudged them to wrap things up (*Red and Black* May 9, 1972). By 1975, UGA had enacted a 10 p.m. curfew to control rowdy behavior, but sometimes the bands still needed a friendly reminder. At one concert, the University Union’s cultural affairs coordinator shortened Doug Kershaw’s performance by cutting off the field’s power (*Red and Black* April 25, 1975). The curfew remained a source of consternation:

[Gatemouth Brown] displayed both of his styles in a two-hour performance that, as we’ve come to expect from a Legion show, grew better as the crowd and the darkness arrived in mid-evening. The only drawback was the early curfew that, as we’ve also come to expect, forced the show’s conclusion just when things were rolling (*Red and Black* September 27, 1978).

In 1985, the *Red and Black* reported that the concerts averaged around 2,000 people, with one R.E.M. event attracting 12,000 people. UGA’s Student Director of Activities noted that the crowds were usually so large that enforcing the no-alcohol policy proved nearly impossible (*Red and Black* September 25, 1985). While a concrete stage on the west side of the field was already in place, in 1983, UGA funded a pre-fabricated shelter (UGA Building #2368) that was installed by Aldridge, Inc. for \$16,000 to support the events (*Red and Black* February 23, 1983). By 1990, a new fence had been constructed around the complex to help contain the masses to a comfortable 4,000 people per event (*Red and Black* April 11, 1990).

By 1975, the City of Athens had opened another swimming pool at Bishop Park. With Legion Pool in need of upgrades and repairs, “[the City] was no longer interested in continuing to manage Legion.” Until that time, because of the 1954 deed agreement UGA did not budget for its operation and, for the 1975 season, the Student Government Association “held an emergency referendum to allocate \$3,100” to support immediate repairs so the pool could open (Save Legion Pool 2025). The pool underwent major renovations in the late 1970s and early 1980s. This included significant repairs to the pool floor (patchwork repairs were superseded by a full replacement); all of the original tile lining the floor was removed and replaced with a marble-dust cement base bed. The original underwater lighting, composed of antique fixtures with irreplaceable parts, was also removed and replaced. Drainpipes were replaced and a new fence was installed around the pool’s perimeter (*Red and Black* April 6, 1978; February 23, 1983). During this same period, the original tile around the pool deck was replaced, the pavilion materials were replaced, the shower stalls were modernized, and the bathhouse was modified to its current aesthetic (*Athens Observer* June 28, 1979). Figures 2.9 through 2.12 provide images of the pool during the 1970s.

In the early 2000s, UGA found significant leakage in the aging pool and proposed its demolition. In 2012, according to one assessment, the pool dropped three inches per day and leaked 24,000 gallons of water into nearby Tanyard Creek. Officials estimated \$490,000 to renovate Legion Pool and proposed constructing a new pool (estimated at over \$2 million) half its size at Lake Herrick near other recreational resources. A newer, smaller pool would result in less than \$100,000 in annual operating expenses and the valuable acreage on Lumpkin Street could be repurposed for residential or academic buildings. However, the Athens public balked at losing the historic pool as a community resource and campaigned to save it from demolition (*Flagpole* August 22, 2012). The pool continues to serve both the University as well as the local community and opens each May for the summer season.

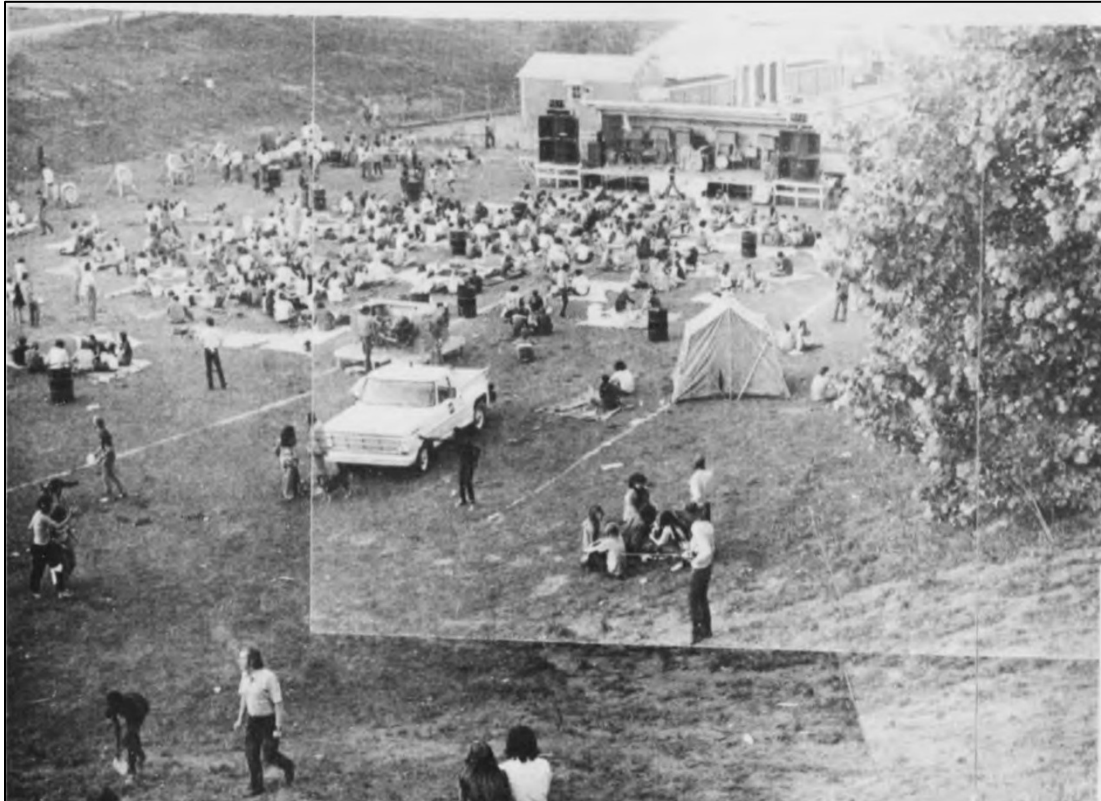


Figure 2.5 View of Legion Field with pool in background (*Red and Black* May 9, 1972).



Figure 2.6 View of Legion Field concert stand, prior to the addition of the metal shelter, early 1980s (photograph from UGA Hargrett Library).



Figure 2.7 View of Legion Pool (left) and field (right), early 1980s. New concert stand shelter is visible at far right (photograph from UGA Hargrett Library).



Figure 2.8 View of Legion Pool (left) and field (foreground) early 1980s (photograph from UGA Hargrett Library).

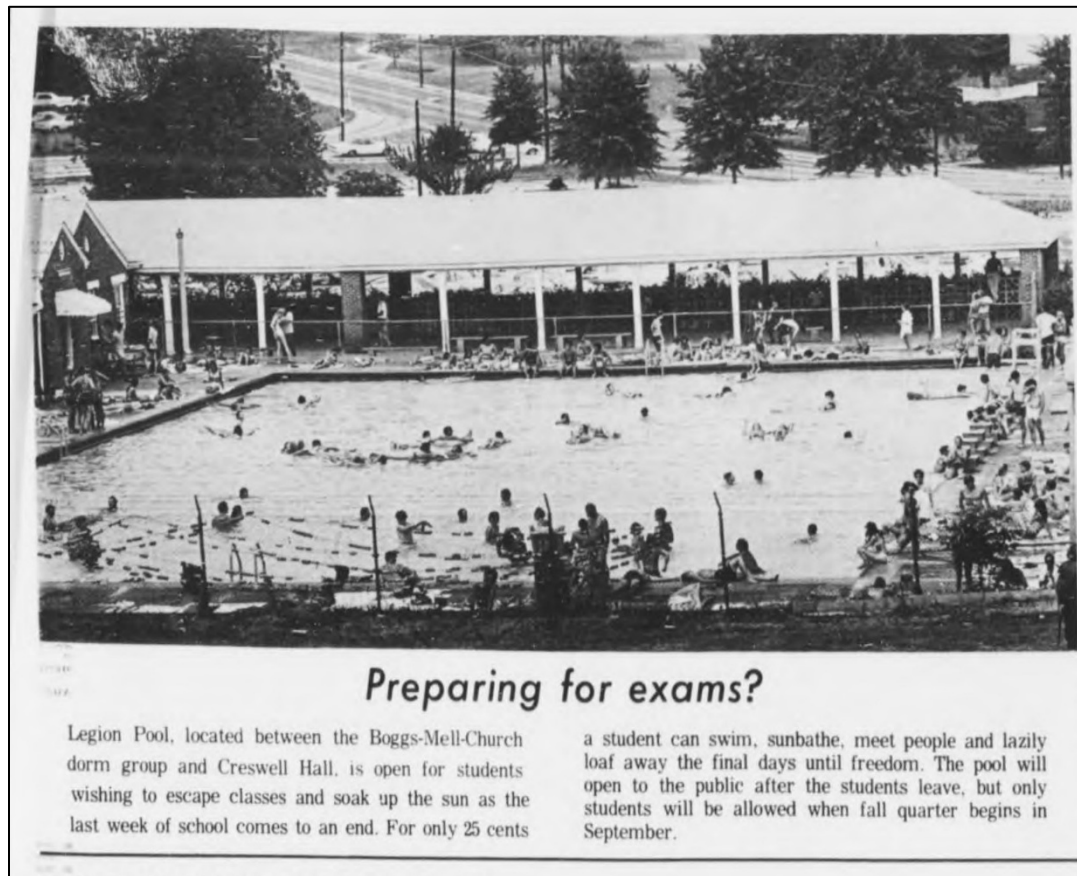


Figure 2.9 View of Legion Pool and pavilion, 1970 (*Red and Black* May 26, 1970).



Figure 2.10 Cleaning of Legion Pool, 1973. Note original tile at pool ledge (*Red and Black* April 17, 1973).

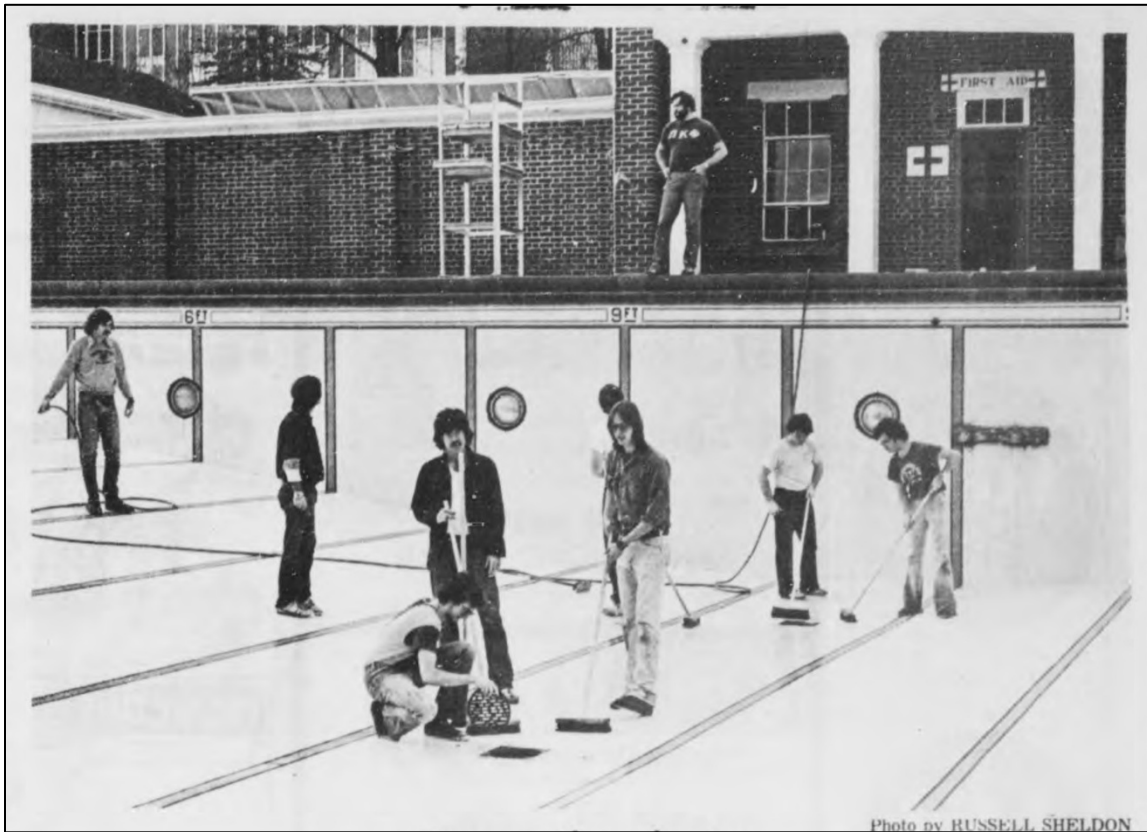


Figure 2.11 Readyng Legion Pool for the season, 1977. Also showing original unpainted brick walls and windows of pool houser (Red and Black March 4, 1977).

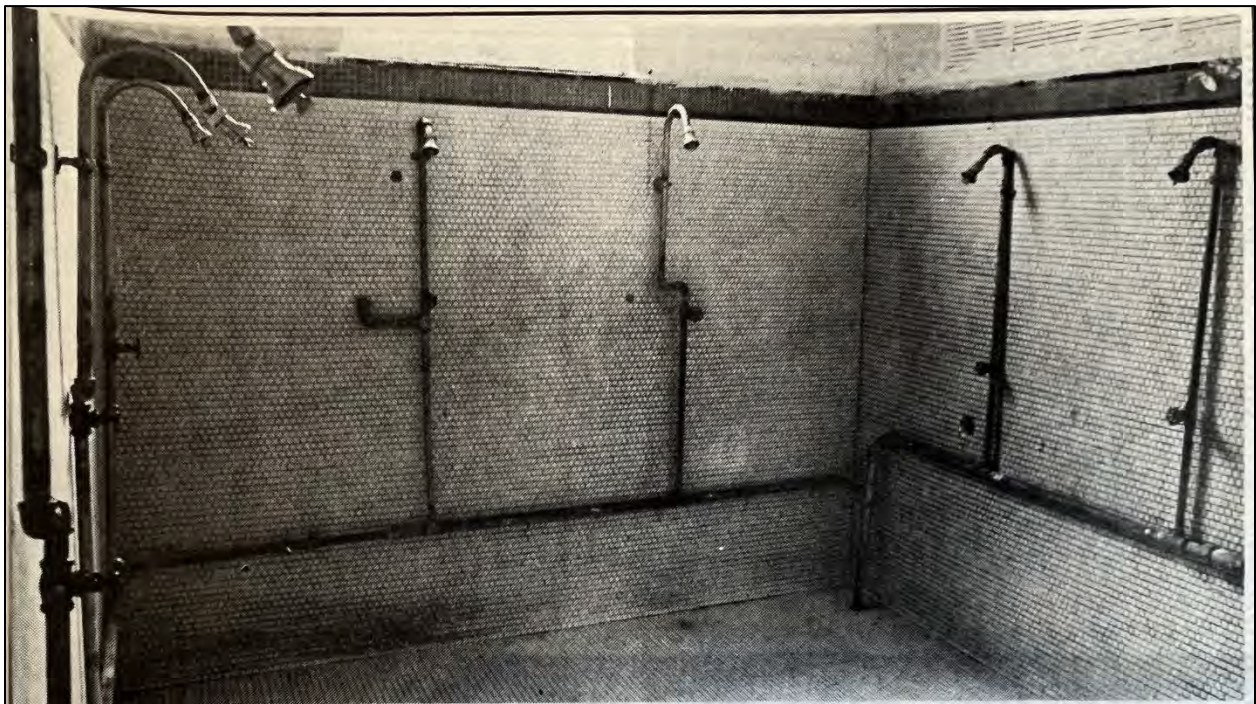


Figure 2.12 View of original showers in bathhouse (Athens Observer June 28, 1979).

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3.0 Resource Description and NRHP Evaluation

During this study, Brockington documented Legion Pool and its associated resources, all located at 802 South Lumpkin Street in the northern portion of the UGA campus in Athens. The facility, which includes Legion Pool (no number), the pool bathhouse (Building No. 2605), Legion Field (no number), and a non-historic concert stand (UGA Building No. 2638), is situated west of South Lumpkin Street between the Hill and Creswell residential halls (see Figures 1.1 through 1.8). The pool and bathhouse were constructed in 1935 and 1936 and the concert stand was constructed in 1983. The pool is oriented northeast-southwest, with the bathhouse forming an L-shape on the northwest and northeast sides of the pool. No original plans for Legion Pool or its bathhouse (Building No. 2605) were found, although the Hargrett Library does retain plans for the original 1930s filter system and its orientation within the basement level of the bathhouse. Figures 3.1 through 3.38 provide photographs of the complex.

The c1936 bathhouse (Building #2605), located on the northwest side of the pool, includes space for gender-based bathrooms and showers, mechanical and storage areas, and other support spaces. Although its architectural design has been somewhat modified, it still features some of its original Colonial Revival style aesthetic, with brick walls, gable roofs, and brick detailing. Many of the doors are non-historic metal replacement units, with windows also being non-historic, two-over-two, double-hung sash replacements. The building consists of five distinct bays, with each end bay having a front-gabled functional space (currently used for storage of chemicals or other materials). The interiors of these two functional sections include terracotta block walls, although the southern wing has some remaining tile on its interior wall (see Figure 3.24).

The next two bays toward the center include the men's and women's restrooms and shower areas (see Figures 3.25 and 3.26). These sections currently have a flat roof, but historic photographs show them originally with raised rooflines (see Figures 2.1 and 2.2) that were likely open and used for ventilation. Ghost marks of the original rooflines are visible on the gabled ends of the central portion of the building (see Figure 3.7). The exterior walls of the restroom areas also feature decorative brick detailing near the roofline. The interiors of the restrooms have been modernized (c1980) with new fixtures, benches, and tiled shower walls.

The central portion of the pool house features a side-gabled roof with louvered vents at the tops of the gabled ends. The poolside façade features four wood columns and a recessed entry. The entry includes a central non-historic, single-leaf door with an original three-light transom above. The flanking windows are modern, one-over-one, vinyl, double-hung units. This interior portion also exhibits several modifications with infilled doors and varying wall materials. The ceiling is also a modern drop ceiling. Recent repairs revealed what appears to be the original, decorative, pressed metal ceiling (see Figure 3.29). Based on historical photographs, the exterior changes to the bathhouse (including the painting of the brick) appear to have been made during the late 1970s renovations.

The basement level (see Figures 3.32 and 3.33) features unadorned formed concrete floors, walls, and ceiling. All of the pool filtration equipment has been modernized, but portions of the original concrete stands for the filter tanks remain on the floor. One of the walls on the northeast side of the basement level includes the carved name of "Woodson Ashford, 1942." This appears to be George Woodson Ashford, born in Watkinsville, Georgia, in 1908. Ashford attended high school in Athens and briefly attended UGA before his acceptance into the U.S. Naval Academy in 1925. Ashford served in World War II, rising to the rank of Captain. He later served in the Korean War and died in 1981, having reached the rank of Rear Admiral

(U.S. Naval History and Heritage Command [NHHHC] 2025). By 1942, when his name apparently was carved at the pool house, Ashford was already a Lieutenant but may have been visiting Athens on leave.

The pavilion (considered part of Building #2605; see Figures 3.21 through 3.23), located near the northeast end of the pool, is an open wood-framed structure with a wood trussed gabled roof clad in asphalt shingles. It measures approximately 125 feet long by 25 feet wide and is primarily supported with brick piers. The northeast side has additional wood supports set on a pierced concrete block wall, with those on the southwest side full height wood posts. The interior is open on all four sides, with the pool-side portion of the pavilion divided from the entrance area by a louvered upper wall. The pavilion is surrounded by decorative plantings and large crepe myrtles. Historic photographs (see Figure 2.2) suggest the pavilion and bathhouse were originally detached, with a covered access area between the two. However, based on historic aerials, the pavilion had taken its current connecting form by 1962.

Legion Pool (see Figures 3.11 through 3.15) measures approximately 150 feet in length by 75 feet wide. It ranges in depth from 2.5 feet at the opposite shallow ends to 9 feet at the center. It is largely lined with concrete, with the sections divided by inlaid black tile installed in the 1970s. The sides of the pool are concrete, though the upper walls are lined with 1-by-1-inch blue and white ceramic tile. The gutter and pool edge also feature black tile borders and the surrounding deck area is poured concrete. The majority of these construction materials date to the late 1970s renovations. Diving boards and stairs are modern, detachable, fiberglass units.

The large, grassed lawn located southwest of the pool is known as “Legion Field” (Figures 3.34 through 3.38). The field is surrounded by a non-historic sidewalk with a non-historic stone wall on the southeast side. The northwest side of the field includes large Magnolia trees, some of which may date to the 1930s when the pool was installed. The far southwest end of the field contains the c1983 concert stand (UGA Building #2638). This metal-framed stand is situated on a raised concrete platform. As noted in Chapter 2, Legion Field was commonly used for concerts and other events for the UGA student body and remains popular for tailgating during football season.

3.1 NRHP Evaluation

The Georgia State Historic Preservation Office (SHPO) commented on the National Register of Historic Places (NRHP) eligibility of the pool during a 2012 demolition proposal. The SHPO noted that based on the information provided, it was their opinion that Legion Pool and its associated “Service Building” (presumably the bath house) were eligible for the NRHP, but no further information was provided (Crass 2012).

Archival research did not identify any information to warrant evaluation for the NRHP under Criterion B (*people*) or D (*information potential*). Under Criterion A (*events*), Legion Pool, its bathhouse, and Legion Field were part of a recreational complex first envisioned by the local American Legion post. The complex was completed between 1935 and 1936 and was funded through a collaboration between the American Legion, the City of Athens, and local citizens, as well as New Deal monies. While the City of Athens (with the Legion’s support) sold the pool and its grounds to UGA in the 1950s, it was managed by the city into the 1970s and remains open to the public today. The associated Legion Field, which was always used for recreational purposes, gained greater popularity with the UGA student body beginning in the 1970s when it was frequently used for sponsored musical and other events. Therefore, Legion Pool, the pool house, and Legion Field all qualify for the NRHP under Criterion A (*events*) at the local level in the areas of recreation, entertainment, and social history.

Under Criterion C (*architecture*), the pool has lost some degree of integrity in terms of its material cladding, but the overall design of the pool (dimensions, depth, etc.) remains the same. While the tiling around the pool is not original, it was installed during the late 1970s, close to the 50-year age mark, and it does not detract from the overall design. Modifications have been made to the bathhouse, originally designed by C. Wilmer Heery, but it retains certain key features including the brick cladding, the overall one-story linear form, most of its gabled roofline, the recessed entry, the rear wall brick detailing, and the perpendicular, open pavilion. Legion Field has been somewhat modified with a new stacked stone wall, new concrete sidewalk circumscribing the grassed lawn, and a non-historic (c1983) concert stand, but it still reflects the defining open space that was used by the public as part of the recreational grounds, as well as by the student body for concerts and football events. Brockington recommends that Legion Pool, its pool house (UGA Building #2605), and Legion Field qualify as an NRHP-eligible complex. However, the non-historic concert stand (UGA Building #2638), built in 1983, is not considered a contributing element. Other non-contributing elements include the non-historic landscape features including the sidewalk and the stone wall around Legion Field.



Figure 3.1 Pool House, near entry, facing south.



Figure 3.2 Pool House, facing southwest.



Figure 3.3 Pool House, facing west.



Figure 3.4 Pool House, facing west.



Figure 3.5 Pool House, rear elevation, facing south.



Figure 3.6 Pool House, rear elevation, facing east.



Figure 3.7 Pool House, ghost mark of old roofline, facing east.



Figure 3.8 Pool House, southwest elevation, facing northeast.



Figure 3.9 Pool House, rear elevation, brick detail, facing southeast.



Figure 3.10 Pool House, rear elevation detail, facing south.



Figure 3.11 Pool House and pool (foreground), facing west.



Figure 3.12 Pool House and pool (foreground), facing northwest.



Figure 3.13 Pool House and pool (foreground), facing northwest.



Figure 3.14 Pool tile detail at west end.



Figure 3.15 Pool House (left) and pool (center), facing northeast.



Figure 3.16 Pool House, front elevation, facing north.



Figure 3.17 Pool House, front elevation, main entry block, facing northwest.



Figure 3.18 Pool House, front elevation, showing recessed entry, facing southwest towards men's room door.



Figure 3.19 Pool House, front elevation, showing recessed covering at concession area, facing northwest.



Figure 3.20 Pool House, front elevation, facing west.



Figure 3.21 Pool House, pavilion area, facing southeast.



Figure 3.22 Pool House, main entry to pool area, facing southwest.



Figure 3.23 Pool House, pavilion area, showing louvered wall, facing northwest.



Figure 3.24 Pool House, southernmost wing, showing interior.



Figure 3.25 Pool House, women's changing area.



Figure 3.26 Pool House, men's changing area.



Figure 3.27 Pool House, central block, office area.



Figure 3.28 Pool House, central block, storage area.



Figure 3.29 Pool House, central block, rear storage area, showing remnants of pressed metal ceiling.



Figure 3.30 Pool House, central block, office area, door detail.



Figure 3.31 Pool House, concession area interior at northeast end of building.



Figure 3.32 Pool House, basement, showing equipment, facing south.



Figure 3.33 Pool House, basement area wall near pumps, showing name of Woodson Ashford, 1942.



Figure 3.34 Legion Field, facing northeast.



Figure 3.35 Legion Field, facing northeast.



Figure 3.36 Legion Field, facing west.



Figure 3.37 Legion Field concert stand, facing south.



Figure 3.38 Legion Field, concert stand facing west.

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ATTACHMENT F

**Letter from Nutter and Associates, Archaeological Survey of the
West Precinct Legion Block, 2023-002, April 18, 2023**

April 18, 2023

Mr. Scott Messer
Director of Historic Preservation
Office of University Architects for Facilities Planning
382 East Broad Street
Athens, Georgia 30602

RE: Archaeological Survey of the West Precinct Legion Block, UGA Tracking No. 2023-0002

Dear Mr. Messer:

Per your email request dated February 10, 2023, Nutter and Associates (NAI) executed appropriate investigative measures to insure that any proposed infrastructure improvements or building construction within a ca. 20-ac tract along the western side of Lumpkin Street on the University of Georgia (UGA) campus would not adversely affect significant cultural resources. The project area is located on the western side of Lumpkin Street, covering an area that encompasses Legion Field and Pool, several student dormitories, and other UGA facilities and their associated parking areas and access roads (Figure 1). The area is heavily developed. The boundary for the area of potential effect (APE) follows South Lumpkin Street along the eastern side, Baxter Street along the northern end, and East Cloverhurst Avenue along the western side. The southern boundary encompasses the Oglethorpe House and Oglethorpe Dining Commons complex before joining South Lumpkin Street. The entire 20-ac tract covers what once was a broad ridge nose that descends gradually northeast toward Tanyard Creek. Along the western edge of the tract is a tributary of Tanyard Creek. The northern end of the tract is dissected by another branch of Tanyard Creek. The confluence of these two tributaries is generally located beneath Legion Pool. Tanyard Creek flows east and exits the APE beneath South Lumpkin Street (Figure 2).

Archival research reviewed early-middle twentieth century aerial photographs dating from 1934, 1938, 1944, 1960, and 1967 and the USDA 1927 Clarke County soil survey map. The project area was georeferenced onto these archival sources to observe changes to the project and surrounding area through the twentieth century. The 1927 USDA Clarke County soil survey map depicts no structures in the project area. The 1934 aerial photograph reveals a series of structures, presumably residences, running along the western side of South Lumpkin Street for about two-thirds the length of the eastern APE boundary. The northern one-third was not built upon. A cluster of about six structures also are present immediately south of Baxter Street, on a toe slope at the confluence of the two Tanyard Creek branches. The 1938 aerial photograph reveals little change, but by 1944 Legion Field is visible. By 1960, dormitories have taken the place of the residences along South Lumpkin and Baxter Streets, and other buildings have been constructed on the southern end of the tract. Legion Pool also is visible. By 1967 the entire tract is very heavily developed. Since 1967, the tract has undergone a number of construction episodes that have modified or replaced original UGA buildings.

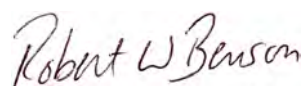
The Georgia Archaeological Site File (GASF) revealed one site, 9CA216, to be located within 1 km of the project area. 9CA216 records a historic period dump deposit comprised of two lenses of historic period debris. The site was identified during archaeological site monitoring of a steam line project on the northern side of Tanyard Creek (Jones 2018). Jones (2018) attempted to reconstruct some of the Athens disposal patterns during the late nineteenth and early twentieth centuries, since the artifacts that were collected during the monitoring project were dated to no later than 1911.

The project area was inspected by NAI field technician James King me on March 3, 2023. King inspected the entire APE by pedestrian survey. The field survey essentially was comprised of 13 photographs. The photographs confirm the amount of construction on the tract. All areas that had vegetation remaining consisted of cut-and-fill areas surrounding structures, parking lots, or access roads that run through the tract. No shovel tests were excavated due to the extensive transformation of the property. No original topographic landforms remain intact.

Archaeological site potential was determined to be very low to nonexistent for the project area largely due intensive use over the past 60 or so years. All evidence of residences that once lined South Lumpkin Street and Baxter Street in the 1930s have been completely obliterated and replaced by much larger University of Georgia structures. After reviewing archival sources through the twentieth century and visual inspection of the project area tract, we conclude that the presence of significant cultural resources is nonexistent. Therefore, since significant cultural resources will not be adversely affected by implementing any future construction projects, we recommend that any proposed projects be allowed to proceed with no further archaeological investigations or monitoring.

If you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in dark ink that reads "Robert W. Benson". The signature is written in a cursive, slightly slanted style.

Robert W. Benson, RPA
Principal Investigator

Reference Cited:

Jones, Joel

2018 *Report on Archival Research and Archeological Monitoring of the West End Improvements Project at Sanford Stadium, the University of Georgia, Athens, Georgia.* Southeastern Archeological Services, Inc., Athens, Georgia. Report prepared for the Office of University Architects for Facilities Planning, University of Georgia, Athens.

Attached Figure List:

Figure 1. Project area superimposed onto a Google Earth Image (2023).	Page 4 of 10
Figure 2. Location of project area on UGA south campus.	Page 5 of 10
Figure 3. Project area superimposed onto the 1934 aerial photograph.	Page 6 of 10
Figure 4. Project area superimposed onto the 1967 aerial photograph.	Page 7 of 10
Figure 5. Looking southwest across the Legion Pool parking lot on the northern end of the project tract.	Page 8 of 10
Figure 6. Looking west across a branch of Tanyard Creek toward dormitories along Baxter Street.	Page 8 of 10
Figure 7. View northeast at the Legion Field dining hall, view from the same location as Figure 6.	Page 9 of 10
Figure 8. Looking southeast from Cloverhurst Avenue across a parking lot, Boggs Hall is in the background.	Page 9 of 10
Figure 9. Looking east across a Tanyard Creek tributary in the southern portion of the project area.	Page 10 of 10

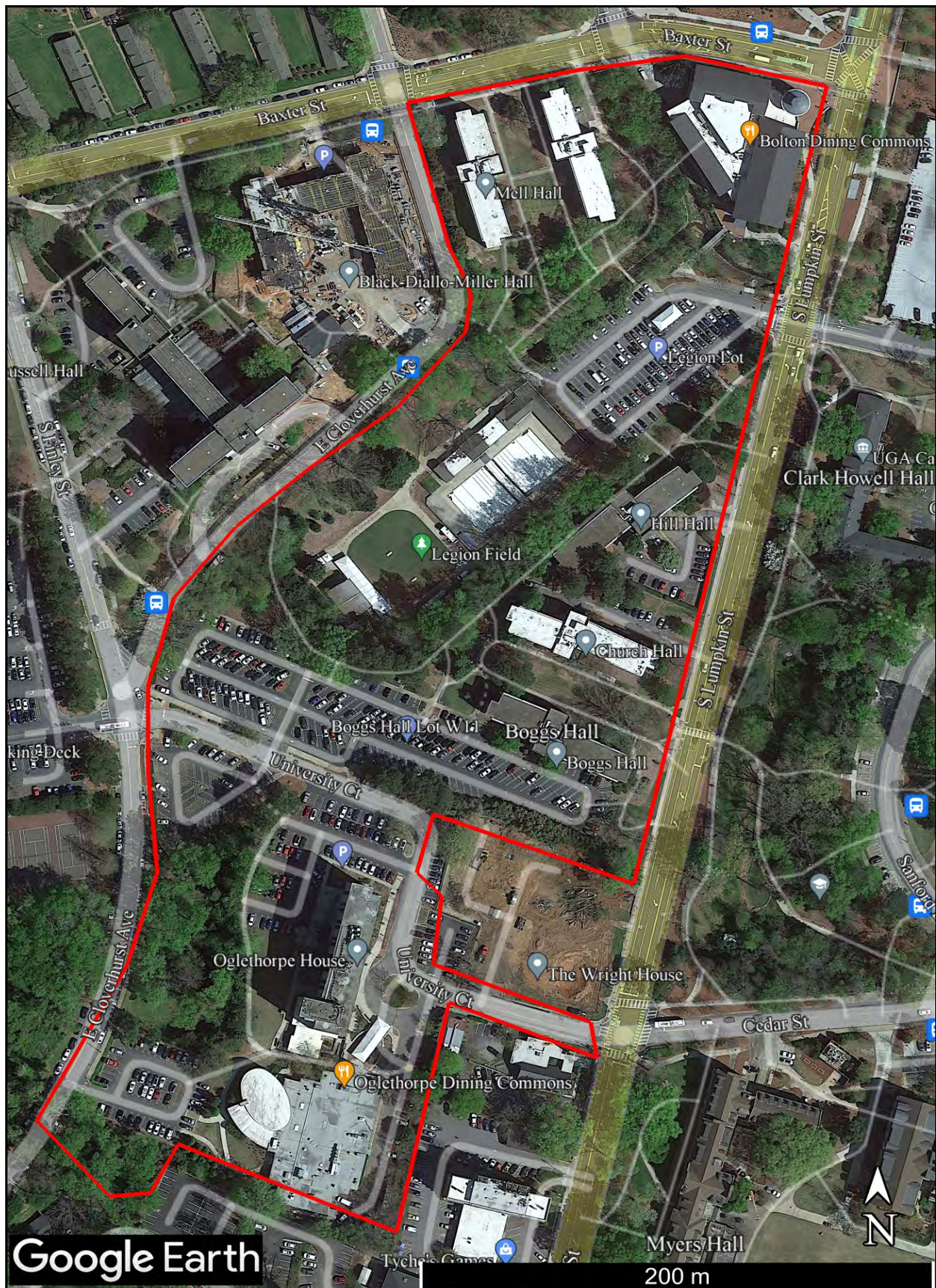


Figure 1. Project area superimposed onto a Google Earth Image (2023).

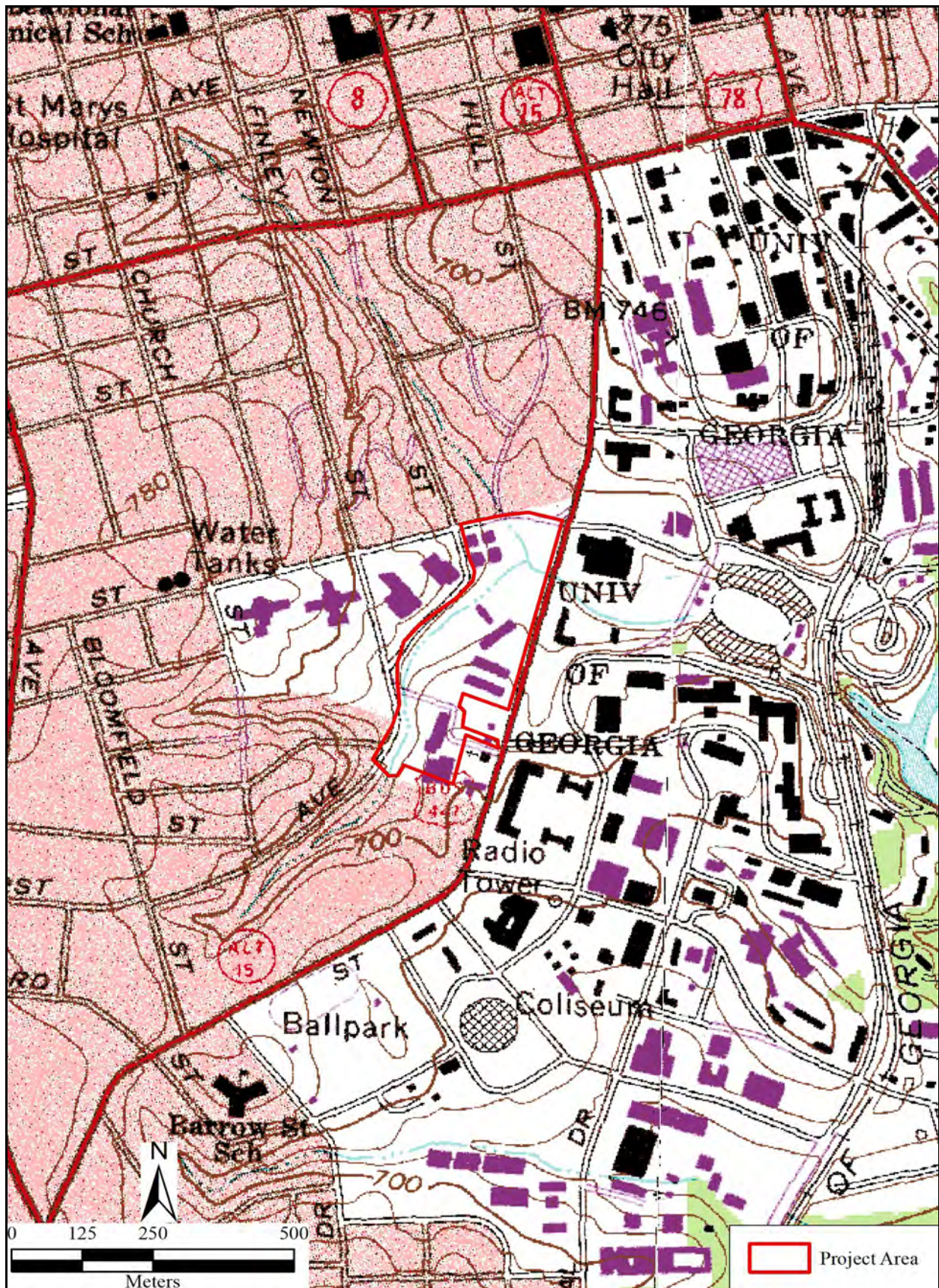


Figure 2. Location of project area on UGA south campus (7.5' USGS Athens West and East quadrangles).

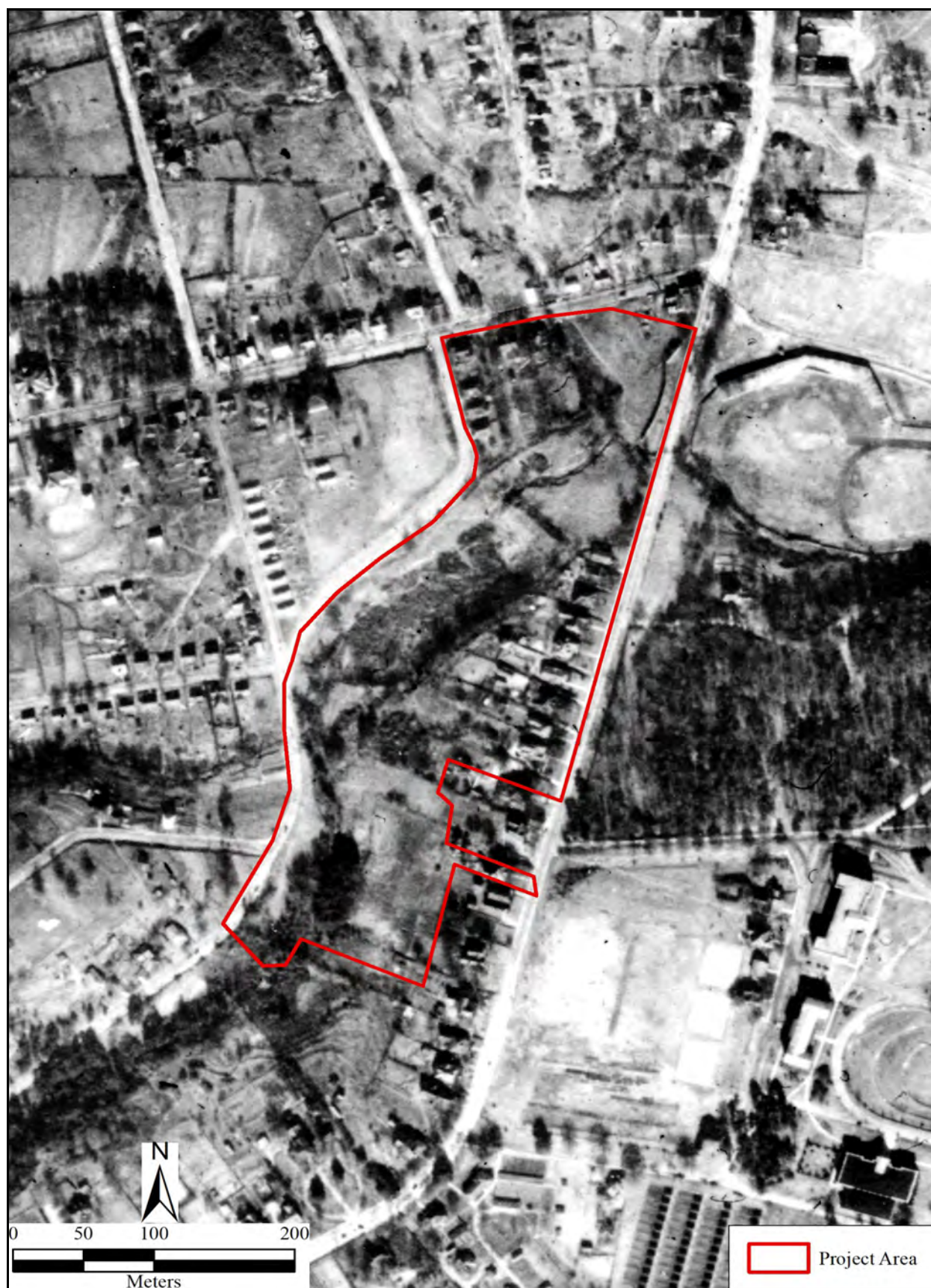


Figure 3. Project area superimposed onto the 1934 aerial photograph.



Figure 4. Project area superimposed onto the 1967 aerial photograph.



Figure 5. Looking southwest across the Legion Pool parking lot on the northern end of the project tract.



Figure 6. Looking west across a branch of Tanyard Creek toward dormitories along Baxter Street.



Figure 7. View northeast at the Legion Field dining hall, view from the same location as Figure 6.



Figure 8. Looking southeast from Cloverhurst Avenue across a parking lot, Boggs Hall is in the background.



Figure 9. Looking east across a Tanyard Creek tributary in the southern portion of the project area.

ATTACHMENT G

**Councilman-Hunsaker Legion Pool Swimming Pool Audit,
July 14, 2025**



Legion Pool

Athens, Georgia

Swimming Pool Audit



Counsilman • Hunsaker
AQUATICS FOR LIFE

Updated: July 14, 2025

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A. EXECUTIVE SUMMARY

Counsilman-Hunsaker was commissioned by the University of Georgia to provide a swimming pool audit for the historic Legion Pool facility on the University of Georgia campus in June 2011. The original report was finalized on November 21, 2011. The outdoor 50 meter pool was originally opened in 1936 as an American Legion outpost and was purchased by the City of Athens in the 1960s and then by the University of Georgia in the 1970s.

Some improvements have been made to the pools and mechanical systems over the years including a replacement of the original tile pool finish with a marcite plaster, the installation of multiple drains to prevent suction entrapment, and the conversion to sand filters. This work was completed in the late 1970s or early 1980s after the university purchased the facility. In 2001, the sand media was replaced in the filter tanks. In 2003, a section of the deck and gutter drain was replaced. And several sections of plaster along the expansion joints have required repeated patching and refinishing .

A site visit to the Legion Pool facility by Carl Nylander of Counsilman-Hunsaker was performed on June 16, 2011. The purpose of the site visit was to evaluate the existing pool and structure, its mechanical systems, and to provide an opinion of probable cost for items identified in need of maintenance or repair in the near future. Carl met with Greg Albanese who is the Associate Director for Facilities and was a key asset in operational and historical knowledge of the facility. This report relies on not only visual observations, but also a combination of estimated data provided by Greg Albanese and Counsilman-Hunsaker's experience from observing similar facilities.

The University requested Counsilman-Hunsaker to provide an update to the original report which is dated July 14, 2025. Work reported to be done over the last 14 years includes addressing some leaking issues, but much of the facility conditions have remained unchanged between 2011 and 20225. Counsilman-Hunsaker has not made any site visits since the original assessment was completed.

Legion Pool is now nearly 90 years old. As with other pools of this age, they are facing physical obsolescence. Of foremost concern is the structural condition of the pool and facility. Significant cracks have been observed by the staff in the pool structure that reveal themselves through the plaster. It was reported that the pool leaks about 3" per day (or approximately 24,000 gallons) when it is idle and not open to bathers. Some of this water lost may also be coming from compromises in the below grade piping, which is assumed to be cast iron.

Losing this amount of water on a daily basis could be causing a deterioration of the subgrade or pooling of water that would result in hydrostatic pressures on the pool shell resulting in some of the pool's structural damage that has been observed. In addition, it was clearly evident that there was some settling and structural damage to the pool deck and the building, most notably by the admissions area and concessions stand room.

Also, with the age of the facility, there are several areas that would no longer be acceptable by most current industry standards including Clarke County. To date, wholesale remediations to

Legion Pool have not been required by code as it has been grandfathered into compliance with most of these standards.

These items as well as others that are identified in need of repair, replacement, and renovation are further explained in the report and itemized in the cost estimate at the end of this report. Counsilman-Hunsaker is of the opinion that all the recommended repairs, replacements, and renovations be considered and implemented.

All references to the regulations of the health department in this report refer to Chapter 300 of the Clarke County Board of Health Rules and Regulations for Swimming Pools, Spas, and Recreational Water Parks.

B. POOL INFORMATION

1. Design Information for the Competition Pool

- a. Dimensions – 170 feet long by 76 feet width
- b. Surface Area – 12,920 square feet
- c. Depth – 2.5 feet depth at both ends and 9 feet at the deepest point in middle
- d. Number of Lanes – Eight lanes in center of pool (remainder of pool typically left for open swim)
- e. Volume – approximately 500,000 gallons
- f. Perimeter – 492 feet
- g. Turnover Rate – approximately 5.75 hours
- h. Design flow rate – approximately 1450 GPM
- i. Filtration Area – approximately 100.5 square feet
- j. Filtration Rate – approximately 14.3 GPM/SF

Dimensions and volumes not confirmed but taken from data provided.

C. POOL ITEMS

- 1. Structure and Finish**
- 2. Perimeter Overflow System**
- 3. Main Drains**
- 4. Inlets**
- 5. Underwater Lights**
- 6. Safety Lines**
- 7. Ingress and Egress**
- 8. Markings and Anchors**

CH Observations, Comments and Recommendations:

1. Structure and Finish

Observations and Comments:

- a) It was reported by the staff that there are portions of the pool tile finish that sound hollow. Portions of the pool wall were even seen clearly bowing into inward in the lap area. A hollow sound typically is indication of inadequate bond between the tile setting bed and the substrate. This is often field tested by dragging a chain over the tile finish and listening for a definitive hollow sound.
- b) Cracks were observed at the expansion joints and it was reported that as of this year, there are now cracks around the perimeter on the far end of the pool. As mentioned in the executive summary, it is likely that this cracking is a result of activity underneath the pool shell that's resulting from the copious amounts of water being lost by the pool daily. It would be uncommon for a pool of this age to experience "natural" settling.
- c) There is approximately 2" elevation difference from one side of the 50 meter pool to the other. This is another sign of some potential subsurface activity. It was reported that this was starting to become evident around 2000.
- d) It was reported that the pool is annually drained in the offseason for maintenance and winterized. It was noted by the staff that there are no hydrostatic relief valves in the main drains. As a result, there is a possibility that subsurface water can cause the pool shell to "float" and pop out of the ground if there are no provisions for dewatering while the pool is empty. This could have caused the cracks observed in item "b" above as well.
- e) At some point in the facility's history the tile floor was replace with marcite plaster. The plaster finish was then painted over and this has been requiring re-painting every 3-4 years.

Recommendations:

- a) When the pool is emptied, it is recommended that cores are taken from the pool floor to observe a variety of different areas below the shell. Further action can be determined upon review of subgrade after core samples.
- b) An alternative approach to taking cores would be to hire a company to use ground penetrating radar to determine conditions below the pool. This is not destructive, so that may be viewed as an advantage. If voids are present, high pressure grout injection can be one method for stabilizing the area prior to addressing the water loss.

- c) Once the condition of the subgrade is evaluated, all cracks larger than 1/8" should be remediated. This typically involves routing out the entire length of the crack, inserting a backer rod and epoxy injecting before refinishing that area.
- d) The pool perimeter gutter was originally designed to skim water off 100% of the pool's perimeter. This is also current best practice within the industry. With the two sides being out of level, this is not achievable. Once the condition of the subgrade is evaluated and remedied, it is recommended that the perimeter gutter be re-leveled to within 1/8" so that water is skimmed off the entire perimeter of the pool. Alternatively, the existing concrete and tile gutter could be removed and replaced with a stainless steel gutter.
- e) Hydrostatic relief valves should be installed in the bottom of each main drain sump.
- f) Chain drag pool tile when the pool is emptied to test for inadequate bond. Refinish as needed.

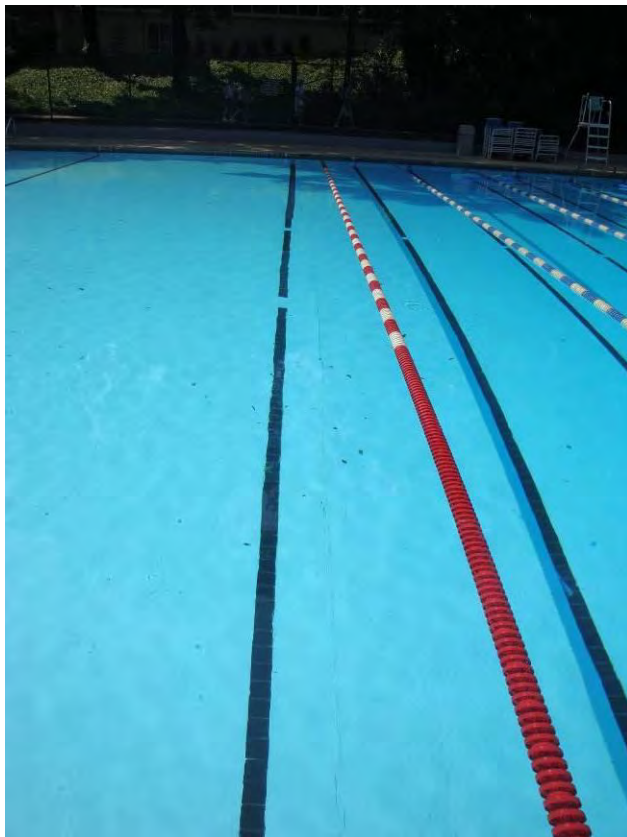


Image 1: Pool Floor Joint and Finish

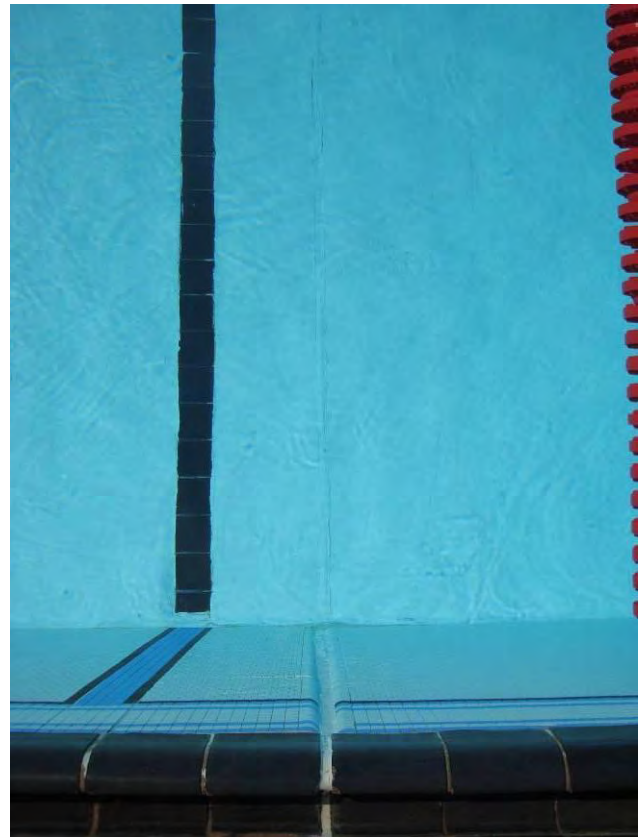


Image 2: Pool Floor and Wall Joint



Image 3: Swimming Pool Structure



Image 4: Cracks in the Bottom of the Pool



Image 5: Perimeter Overflow and Tile



Image 6: Pool Wall Tile

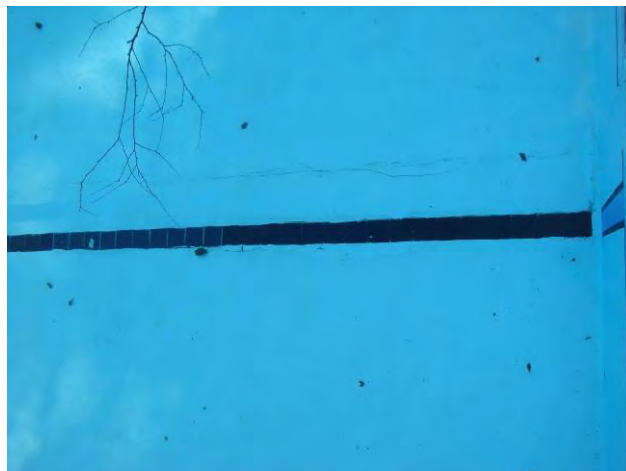


Image 7: Cracks in the Bottom of the Pool

2. Perimeter Overflow System

Observations and Comments:

- a) The perimeter overflow water is returned to the recirculation system through a concrete and tile rollout style gutter.
- b) There are a total of 28 dropout locations around the perimeter of the pool. Five are located in each of the short end gutters and nine along each of the long sides of the pool. Current regulations (paragraph 300.11(5)) require that 100% of the designed recirculation flow be sized to be handled by the perimeter overflow gutter. This would equate to approximately 51.8 GPM per dropout.
- c) As mentioned in the previous section, there is approximately 2" elevation difference from one side of the 50 meter pool to the other. This is another sign of some potential subsurface activity. It was reported that this was starting to become evident in the past 10-12 years.

Recommendations:

- a) Pipe sizes for each of the gutter dropout pipes were not able to be determined. Based upon the flow rates calculated above, it should be verified that 3" pipes (minimum) are provided at each location.
- b) As mentioned in the previous section, the pool perimeter gutter was originally designed to skim water off 100% of the pool's perimeter. This is also current best practice within the industry. With the two sides being out of level, this is not achievable. Once the condition of the subgrade is evaluated and remedied, it is recommended that the perimeter gutter be re-leveled to within 1/8" so that water is skimmed off the entire perimeter of the pool.
- c) Alternatively, as mentioned in the previous section, the existing gutter can be sawcut and removed. A new stainless steel gutter could be set level and grouted underneath.
- d) A third option would be to install a stainless steel gutter with a water-tight PVC membrane on the entire pool. This would come with a 10-year warranty on any water loss and a 25-year structural warranty for the stainless steel components. This option is discussed in more detail in Appendix A.



Image 8: Gutter Dropout



Image 9: Perimeter Overflow Gutter

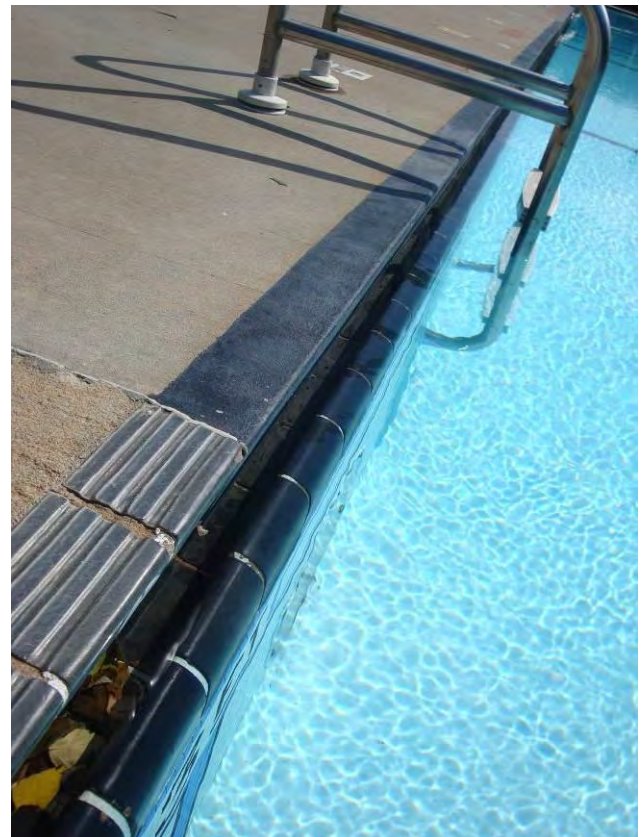


Image 10: Perimeter Overflow Gutter

3. Main Drains

Observations and Comments:

- a) Four main drains are located in the center of the pool. Each location has three 12" x 12" domed PVC covers. The covers were reportedly manufactured by Hayward and were involved in a recall. However, allegedly, they don't need to be replaced in the case there are multiple drains installed in parallel (which is true of the Legion Pool facility).
- b) With the quantity of main drains in place, the velocity for each of the twelve drains based on the estimated recirculation rate of 1450 GPM is approximately 0.72 ft/sec. This is well below the maximum allowable code velocity of 1.5 ft/sec.
- c) It was noted by the staff that there are no hydrostatic relief valves in the main drains. As a result, there is a possibility that subsurface water can cause the pool shell to "float" and pop out of the ground if there are no provisions for dewatering while the pool is empty.

Recommendations:

- a) Confirm whether or not the Hayward main drain covers and sumps still meet all requirements of the Federal Virginia Graeme Baker Pool and Spa Safety Act (VGBA). Failure to comply with this regulation can result in the forced closure of the facility and substantial fines levied by the Federal Government. Documentation of VGBA compliance should be kept in the office for records.
- b) Hydrostatic relief valves should be installed in the bottom of each main drain sump.
- c) All main drains should also comply with ASME ANSI/APSP-16-2011 which requires a vertical separate between the top of the drain suction pipe to the underside of the drain cover of 1.5 times the suction pipe diameter.



Image 11: Pool Main Drains

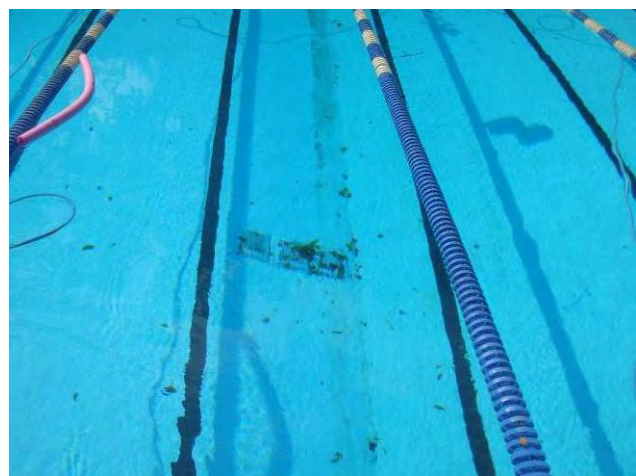


Image 12: Pool Main Drains

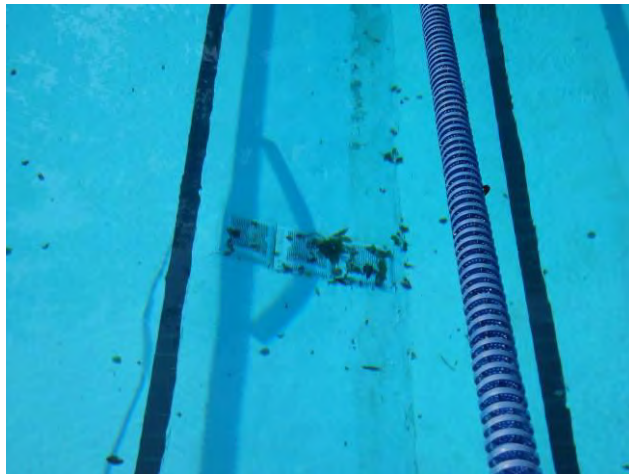


Image 13: Pool Main Drains

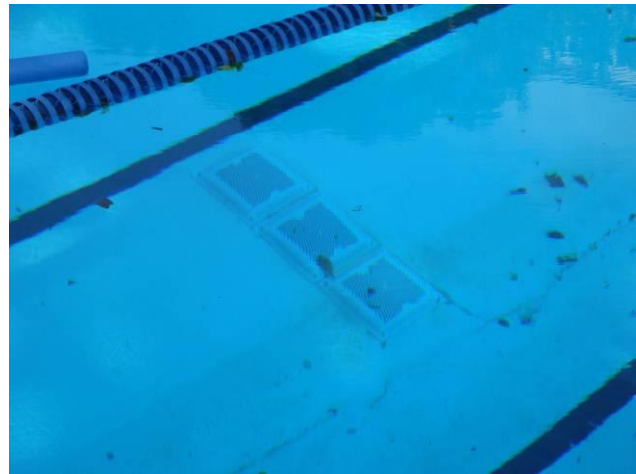


Image 14: Pool Main Drains

4. Inlets

Observations and Comments:

- a) Only eight wall inlets are provided for the entire 50 meter pool. They are just located on the end walls of the pool. Based on the estimated recirculation rate of 1450 GPM, each inlet is designed to accommodate 181.3 GPM which would dictate at minimum a 3" pipe serving each inlet to stay below 10 ft/sec maximum allowable code velocity (300.07(2)). It is likely that each wall inlet is maximized for flow from a fitting size and pipe size standpoint. If a dye test were performed, it's likely that there are several areas within the pool of stagnant water since the pool surface area is so large and there are a limited number of inlets.
- b) The existing inlet fittings and presumably the connection through the pool wall, is all original cast iron. Cast iron is not suitable for long term performance in chlorinated water and widespread corrosion on the original inlets that remain.

Recommendations:

- a) If the pool is ever renovated to provide a pump and filtration system within current code minimums, additional recirculation fittings and pipes will need to be provided. It's recommended that a floor inlet system be considered, if feasible, for a more even distribution of flow.
- b) Should the option be pursued with the new stainless steel gutter that includes a water-tight PVC membrane (Myrtha Renovaction, see Appendix A), a new single return line could be routed inside of the existing pool and then connected to an appropriate quantity of inlets.



Image 15: Wall Inlet Fitting

5. Underwater Lights

Observations and Comments:

- a) Twenty-two underwater light niches (eleven on each long side of the pool) were utilized at some point and have since been abandoned. Stainless steel plates are currently fixed over each niche.

Recommendations:

- a) If underwater lights were ever considered in the future, twenty-two 500 watt lights would provide underwater light levels of 0.85 watts per square foot (W/SF) of water surface area. Code dictates that a minimum of 1.5 W/SF be provided if the facility is used for night swimming. This deficiency would need to be addressed.

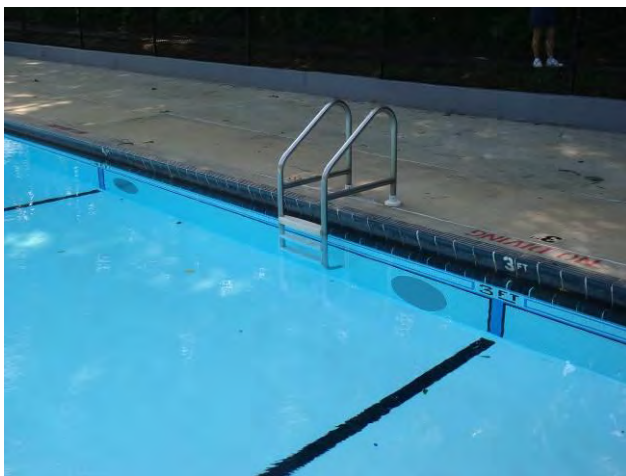


Image 16: Abandoned Underwater Light



Image 17: Underwater Light Junction Box

6. Safety Lines

Observations and Comments:

- a) No safety lines are provided. However, code standards require a float rope and a 4" wide contrasting band (300.05(4)(b)) between shallow water and deep water.
- b) Additional contrasting bands at shallower depths were noticed, however, the purpose was not discerned.

Recommendations:

- a) Safety ropes, anchors, and contrasting bands should be provided at shallow to deep water transitions per code requirements. The contrasting band could either be tiled or painted.



Image 18: Shallow Water and Contrasting Markings

7. Ingress and Egress

Observations and Comments:

- a) Ingress and egress requirements are addressed with four sets of ladders and two removable stairs. Code requires a means of entry/exit at least every 75 feet of lineal pool perimeter (300.06(2)(d)).
- b) No handicap lift was observed for ADA accessibility. ADA has now become law for all new and existing swimming pools. Based on the perimeter of this pool

(larger than 300 lineal feet), a primary means of ADA access as well as a secondary means of access needs to be provided.

Recommendations:

- a) One additional stair or ladder would need to be provided to meet current regulations based on the pool perimeter of nearly 500 LF.
- b) The portable stairs may meet secondary ADA accessibility standards. The width of the railings should be measured to determine if they are within tolerance (33" – 38") and riser / tread minimums are met. The most practical means of primary access to be provided in existing pools is a portable handicap lift. These can be moved around the pool deck without the need of anchors. If the stairs are not ADA compliant, a second lift would be necessary.

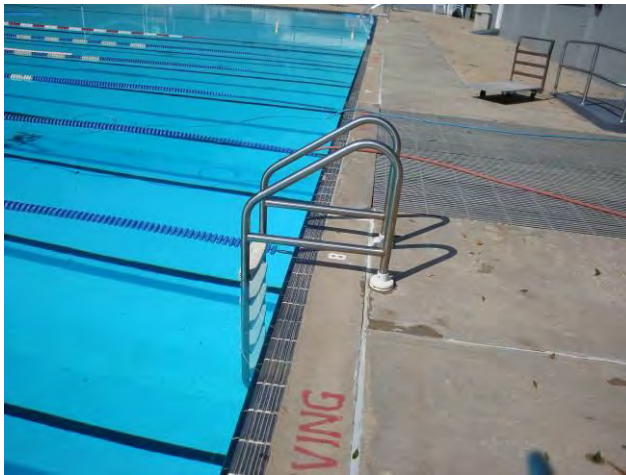


Image 19: Lap Pool Structure



Image 20: Shallow End of Lap Pool

8. Markings and Anchors

Observations and Comments:

- a) Vertical and horizontal depth markings and "No Diving" warning signs are provided in paint and tiled finishes.
- b) The "No Diving" signs are provided around the entire pool.
- c) Racing lane markings and targets are provided in black tiles contrasting with the white plaster background. The floor markings are simple lines and do not confirm to any regulatory requirements (such as NCAA, NFSHSA, FINA, etc.). However, this isn't particularly necessary since competitions are not held at this facility.

- d) No anchors were observed for required safety ropes mentioned earlier in this report.

Recommendations:

- a) Most markings are in good shape and shouldn't require replacing under normal wear-and-tear circumstances. However, current regulations require 4" high characters or larger which the superscript "FT" doesn't currently comply in a number of locations. Depth markers are required at maximum and minimum depths, slope changes, and at least every 25 ft around the pool's perimeter (300.18(3)).
- b) Anchors are required for safety ropes as mentioned earlier in this report. Note that all metallic embeds should be bonded and taken to a common ground per NEC 680.

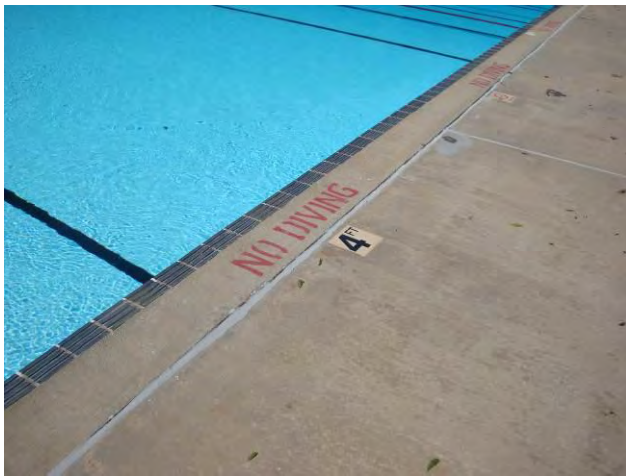


Image 21: Warning and Depth Markings



Image 22: Warning and Depth Markings



Image 23: Lane Marking & Rope Anchor

D. DECK ITEMS

- 1. Deck**
- 2. Starting Blocks**
- 3. Safety Equipment**
- 4. Maintenance Equipment**
- 5. Deck Equipment**

CH Observations, Comments and Recommendations:

1. Deck

Observations and Comments:

- a) Deck widths are approximately 15'-3" on the long sides of the pool, 29'-3" on the far end of the pool, and 19'-6" on the near end of the pool.
- b) The deck finish is a broom finished concrete and appeared to be slip-resistant. Area drains are provided throughout for drainage. Not all of deck water will be able to independently drain to these area drains due to deck settling and cracks.
- c) There were a number of cracks in the deck. Most had been sealed and several of these instances are shown in the images with this section of the report. The staff commented that the deck cracks are re-caulked every year during routine maintenance. The cracks are most likely the result of on-going settling with the pool and building that's previously been documented.

Recommendations:

- a) Maintenance on the deck cracks should continue. Any open cracks larger than 3/16" should be filled and any vertical separation across a crack greater than 1/4" should be remedied (300.06(1)(j)).



Image 24: Deck Cracks and Sealant



Image 25: Deck Cracks and Sealant



Image 26: Area Drain



Image 27: Grating Over Below Grade Piping and Pool Mechanical Area



Image 28: Deck Cracks and Sealant



Image 29: Pavilion Side Deck

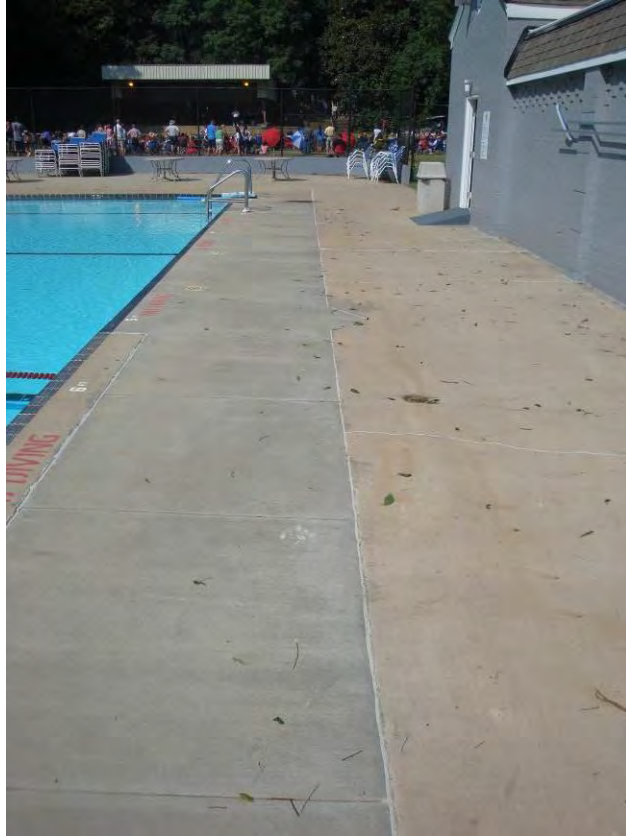


Image 30: Deck Jointing

2. Starting Blocks

Observations and Comments:

- a) Starting blocks were not observed at the facility. However, starting block anchors were observed along the far length of the pool and the striped lap lanes. These appear to have been used at one point and since abandoned. The reason for abandoning the blocks are unknown and may have been due to an injury or for insurance premium reasons.

Recommendations:

- a) The deep cross course lap lanes are able to accommodate starting blocks if the decision is made to re-install them. Different regulatory bodies (NCAA, FINA, USA Swimming) allow starting blocks in various depths, allowing installation in water depths as shallow as 4 feet in some instances.



Image 31: Starting Block Anchor

3. Safety Equipment

Observations and Comments:

- a) The following safety equipment was observed during the site visit:
 - 1) Two ring buoys with throw ropes were observed, one on each end of the pool.
 - 2) One life hook or “shepherd’s” hook was observed and mounted to the building.
 - 3) Two spineboards.
 - 4) First aid kit.
 - 5) Eight rescue tubes.
 - 6) A test kit for measuring water chemistry.
- b) One emergency telephone was also observed at the facility.

Recommendations:

- a) Ensure that all safety equipment is readily available to lifeguards on duty.



Image 32: Mounted Life Hook



Images 33: Rescue Tubes



Image 34: Spineboard

4. Maintenance Equipment

Observations and Comments:

- a) Three robotic cleaners were available at the facility including one that was in use during the visit.

Recommendations:

- a) Consider having a portable vacuum at the facility for easier “spot” and manual cleaning by the staff.

5. Deck Equipment

Observations and Comments:

- a) Three lifeguard chairs were on deck, one tall stand and two short.
- b) 4” Competitor lane lines were in the pool at the cross course lap lanes.

Recommendations:

- a) There do not appear to be any local regulations dictating the quantity of lifeguard chairs at the facility. However, industry standard is for one chair for every 2000 square feet of pool surface area. This would require an additional 3-4 chairs be provided. This should be considered, especially if there are instances of high bather loads during the season.



Image 35: Lane Lines



Image 36: Lifeguard Chair

E. POOL MECHANICAL ITEMS

- 1. Piping**
- 2. Pumps and Strainers**
- 3. Filtration**
- 4. Valves**
- 5. Chemical Treatment**
- 6. Chemical Controller**
- 7. Pool Heating**
- 8. Make-Up Water**
- 9. Mechanical Room**
- 10. Support Spaces and Miscellaneous**

CH Observations, Comments and Recommendations:

1. Piping

Observations and Comments:

- a) All piping visible in the pool mechanical area is Schedule 80 PVC. Given the age of the facility, it's assumed that the buried piping below the deck and pool is cast iron. It was reported that the PVC plumbing was installed in the late 1970s or early 1980s.
- b) The suspended PVC plumbing in the mechanical room was supported largely from heavily corroded pipe hangers.
- c) There were no directional arrows or labels identifying the specific piping runs (main drains, gutters, to/from filter, chlorine, CO₂, backwash, fresh water, etc.).
- d) Some pipe leaks were observed. A leak was observed on the return line going back to the pool over where the chemicals are injected. This leak has reportedly been fixed a few times in the past. Other leaks were seen coming down the wall where the gutter piping comes into the mechanical room.
- e) There is reportedly a spring or aquifer under the pool but was not independently confirmed by any data during the visit. Continuous flowing water can be observed in the backwash pit at all times.
- f) Two analog Signet flow meters are installed to measure the recirculation flow rate. One flow meter was measuring 700 GPM while the other was reading 750 GPM.
- g) No backwash flow meter was installed on the filter backwash line. A backwash throttling valve was provided.
- h) The gutter pipes are each 10", the combined suction pipe is 12", two 10" suction pipes go into each pump, an 8" pipe is provided at the filter and back to the return loop. The gutter lines (two 10") are the limiting factor for any upsizing equipment. Based on current regulations on flow limits (300.07(2)) and assuming that the gutter must be sized to handle 100% of the flow rate at 3 ft/sec gravity piping velocity, the maximum allowable flow rate is approximately 1344 GPM. The remainder of the piping system observable in the mechanical room is well under maximum velocity code limits. A 4" drain line is plumbed to drain the pool to the sanitary sewer.

Recommendations:

- a) The below grade plumbing should be tested to determine if it's water tight. The pipe penetrations in the main drain sumps, gutter dropouts, and inlet fittings should be plugged. Then the pipes can be placed under modest pressure to determine

whether or not it's maintaining pressure or leaking. If pressure is unable to be maintained, camera tests could be carried out by an outside company to scope a camera down each pipe to look for compromises in the wall of the pipes. This would help to determine the approximate locations of the leaks and enable localized demolition and pipe replacement.

- b) All of the pipe hangers and supports should be replaced with those manufactured by Cooper, model B-Line, or equal.
- c) Pipes should be labeled with directional arrows and appropriate function identification.
- d) The leaks at the coupler near the chemical injection point should be repaired. It's not known whether a water seal is provided around incoming and outgoing pipes in the mechanical room (see image #39). Water seals or link seals (even better) around those pipe penetrations should be considered, if practical.
- e) If any demolition is done to the pool floor, the reported spring or aquifer should be observed. Without the benefit of as-built drawings of the facility, it may have been constructed with an under drain system (though it's reported that there is water evident even while the pool is empty). If true, the water observed may be coming from the pool itself. The water in the sump could be tested for water chemistry to see if it's more typical to incoming source water or pool water. More definitive tests may be carried out if the pool chemical levels are spiked.
- f) The system throttling valves should be adjusted so that both Signet flow meters are reading the same flow rates.
- g) An impact flow meter should be installed on the backwash and pool drain lines (Blue White or equivalent).



Image 37: Water Stains on the Walls



Image 38: Pool Drain Sump and Water From Under Pool



Image 39: Water Stains on the Walls



Image 40: Pool Return Pipe and Leak



Image 41: Suction Piping



Image 42: Mechanical Room Piping & Hangers



Image 43: Piping To/From Filters



Image 44: Corroded Clevis Hanger



Image 45: Flow Meters



Image 46: Chemical Injection Points & Piping Leak

2. Pumps and Strainers

Observations and Comments:

- a) Two parallel recirculation pumps are provided. The pumps are manufactured by Peerless with Baldor motors. Both pumps are 15 hp, 1750 RPM, 3 phase, end suction close-coupled pumps. No other rating information (designed flow rate, efficiency, total dynamic head, etc.) was visible on the pumps.
- b) Throttling valves were marked open.
- c) Mermade fiberglass hair and lint strainers were installed. They appeared in good condition, though the baskets were dirty.

- d) No vacuum or pressure gauges were installed on either recirculation pump.

Recommendations:

- a) If it can be obtained or found in the records, the pump curves for both installed pumps should be laminated and mounted in the mechanical room. This will help to determine operating conditions of the pumps.
- b) One vacuum gauge and one pressure gauge should be installed on each pump. These pressure readings will enable pump curve readings to be obtained. The valves should be installed as close to the pump as possible for most accurate system readings.



Image 47: Drain Pump



Image 48: Recirculation Pumps



Image 49: Drain Pump



Image 50: Recirculation Pumps and Hair and Lint Strainers



Image 51: Hair and Lint Strainers



Image 52: Recirculation Pump with No Gauges



Image 53: Recirculation Pumps



Image 54: Recirculation Pumps

3. Filtration

Observations and Comments:

- a) Two vertical high rate sand filters provide filtration for the pool. They are Neptune-Benson tanks and reported to be approximately 45-50 years old.
- b) There was corrosion evident on the exterior of the stainless steel shell. The staff reported that there was originally a liner inside of the tanks that are completely gone. This was observed when the sand media was last replaced in 2001.
- c) There was no name plate data on the filter itself. Filter area was assumed based on rough dimensions taken on site.

- d) Schedule 80 PVC face piping with manual backwash is provided. Air relief lines are also provided for each tank. The butterfly valves appeared to be in good conditions.
- e) The backwash procedure was posted. It was reported that the filters are backwashed weekly.
- f) Backwash flow rate is assumed to be approximately 750 GPM based on the measured filter tank and a conventional sand backwash flow rate of 15 GPM/SF. This flow rate dictates that a 6" minimum pipe should be provided.
- g) The backwash water is pumped to a detention tank outside of the support building.
- h) Filter pressure gauges were provided for the filters. The two influent gauge readings were 18 PSI and 15 PSI, and the two effluent gauge readings were 11 PSI and 7 PSI, respectively.

Recommendations:

- a) Most tanks typically experience a life of 30-35 years. Since the existing sand filters are well beyond this timeframe, it is recommended to install new tanks.
- b) Assuming that the sand has not been replaced since 2001, it is well outside the recommended replacement interval of 5-7 years.



Image 55: Pool Filter Tank #1



Image 56: Pool Filter Tank #2



Image 57: Filter Tank Corrosion



Image 58: Corrosion at Filter Manway



Image 59: Filter #2 Gauge Panel



Image 60: Filter Tank Corrosion



Image 61: Filter #1 Gauge Panel



Image 62: Filter Backwash Piping

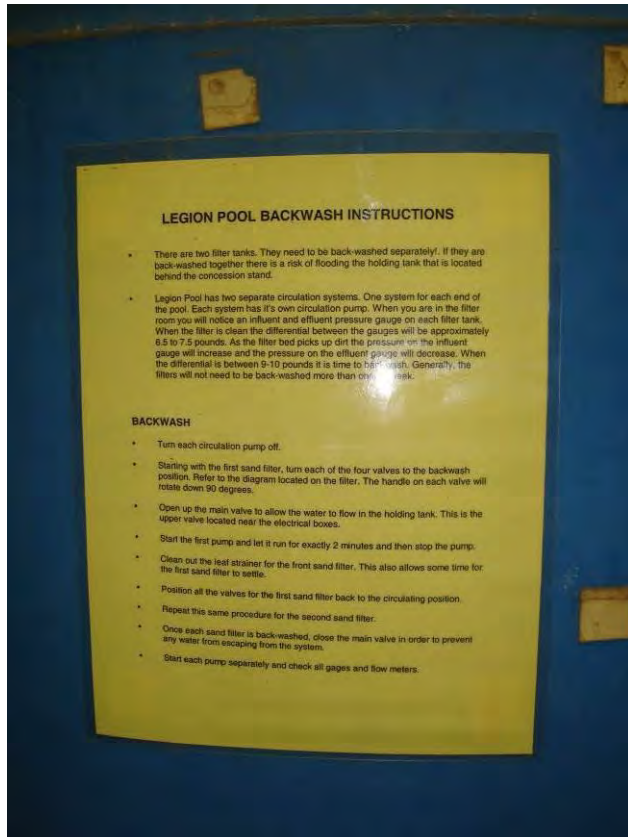


Image 63: Posted Backwash Procedure



Image 64: Manway



Image 65: Backwash Holding Tank Access Hatch



Image 66: Backwash Holding Tank Interior



Image 67: Backwash Holding Tank



Image 68: To Sanitary Sewer

4. Valves

Observations and Comments:

- a) Butterfly valves were provided in the pool mechanical room. Most appeared in good condition. Larger valves had gear operators.
- b) The valves were not marked or tagged.
- c) A check valve was provided on the discharge of both recirculation pumps.

Recommendations:

- a) It's typically recommended to install check valves at least five pipe diameters upstream (40" minimum in this instance) from any fittings on the discharge side of the pump. This is to protect the pump from potential water hammer.
- b) It's recommended that all valves get marked with their normal operating positions and tagged. A corresponding valve reference chart can describe that valve's function to anyone in the pool mechanical room.



Image 69: Main Drain Valve



Image 70: Recirculation Pump Suction Isolation Valves



Image 71: Filter #2 Valve Manifold



Image 72: Filter #1 Valve Manifold



Image 73: Recirculation Pump Check Valve

5. Chemical Treatment

Observations and Comments:

- a) Liquid chlorine is used as the primary sanitizer for the pool. Five 220 gallon storage tanks are provided for the chlorine. The LMI feed pumps are reportedly re-built annually.
- b) Carbon dioxide is used as the main pH buffering agent for the pool via two Siemen's feeders.
- c) The chemicals are injected in the mechanical room after the filters. These lines are reportedly re-plumbed annually.
- d) Cyanuric acid and soda ash were reportedly used by the staff periodically to maintain proper water chemistry.
- e) There was no signage on the chemical room doors indicating health hazard, flammability, and instability hazard.
- f) There was no exhaust provided for the chemical storage room (windows are typically left open for ventilation). However, only mild corrosion was evident on support brackets.

Recommendations:

- a) Signage for all chemicals in the chemical storage room should be mounted on the entry door indicating health hazard, flammability, and instability hazard (3, 0, 0, respectively, for carbon dioxide; 3, 0, 1, respectively, for solid chlorine; and 2, 0, 1

respectively, for liquid chlorine) in conventional diamonds. MSDS sheets should also be kept on hand in the chemical room with water-based fire extinguisher(s).



Image 74: Chemical Injection Locations



Image 75: Chlorine Pump and Shelf



Image 76: Liquid Chlorine Storage Tank



Image 77: 750 lb Carbon Dioxide Storage Tank



Image 78: Chemical Room Windows Open For Ventilation



Image 79: Supplemental Pool Chemicals in Storage



Image 80: Lap Pool Structure



Image 81: Shallow End of Lap Pool



Image 82: Chemical Storage Room



Image 83: Water Chemistry Signage

6. Chemical Controller

Observations and Comments:

- a) A Chemtrol PC3000 water chemistry controller is located off of the pool deck and provides automated water chemistry control for the swimming pool.
- b) There was reportedly no cleaning protocol in place for the controller's probe. The probe was recently installed one year ago.
- c) The following chemical controller readings were observed during the site visit:
 - a. 4.5 ppm chlorine
 - b. 691 ORP
 - c. 7.6 pH
 - d. 220 ppm calcium hardness
 - e. 80 ppm total alkalinity
 - f. 80 degree Fahrenheit water temperature
 - g. -0.03 Langelier Saturation Index (LSI)
 - h. 60 min time out for chlorine
 - i. 15 min time out for pH buffer
 - j. 15 ppm high alarm for chlorine
 - k. 0 ppm low alarm for chlorine
 - l. 8.5 high alarm for pH
 - m. 7.0 low alarm for pH
- d) Carbon dioxide cycles 30 sec on / off 1 minute.
- e) The county requires that 3.5 ppm chlorine levels are maintained at minimum levels of 3 ppm if cyanuric acid is used.

- f) The controller is wired for remote access.

Recommendations:

- a) All controller readings are within typical recommended ranges. Note that the LSI reading of -0.3 is at the extreme low end of recommended operating range (-0.3 to +0.3).
- b) It's recommended to adjust the high alarm to no greater than 8.0, the low alarm for chlorine at 1.0 ppm, and the high alarm for chlorine at 5 ppm.
- c) Follow manufacturer's recommendations for cleaning controller probes. The probes are the most critical part of the controller and should be properly cleaned monthly. If there are deviations between manual readings and the readings at the controller displays, it's a sign that the probes are in need of cleaning.



Image 84: Water Chemistry Controller



Image 85: Chemical Controller Display



Image 86: Sample Stream & Probe Assembly

7. Pool Heating

Observations and Comments:

- a) A Raypak gas fired boiler is in the mechanical room and has been abandoned after only one month of use due to high operating costs to heat the pool water. Venting is in place, but plumbing to the pool piping is capped and not connected.

Recommendations:

- a) No action necessary unless the facility wishes to operate the pool for extended seasons in the future. The size of the heater would need to be confirmed and pool covers should be considered to save on losses.



Image 87: Pool Heater



Image 88: Pool Heater Venting



Image 89: Pool Heater and Piping

8. Make-up Water

Observations and Comments:

- a) The pool water is manually added to the pool. It can be done in the pool mechanical room through a 2" line that is hard piped to the pool return line.
- b) The manual fill valve is difficult to access given its height above the finished floor of the mechanical room.
- c) A backflow preventer is installed on the 2" pool fill line.

Recommendations:

- a) Provide a chain operator on the manual fill valve in the mechanical room.



Image 90: Fill Line Backflow Preventer



Image 91: Manual Fill Valve



Image 92: Fresh Water Fill Connection to Pool Return Piping

9. Mechanical Room

Observations and Comments:

- a) General access into the mechanical room is through a conventional single door and set of stairs. Removing or installing any large equipment in the future will be difficult. Equipment will likely need to be lowered / raised through the grating in the deck. This will likely require the removal of a lot of pool piping.
- b) ABC-type fire extinguishers are provided in the pool mechanical area. These type of extinguishers can react negatively with conventional pool chemicals.

Recommendations:

- a) If equipment removal / installation requires the removal of pool process plumbing, new piping that's required to be re-plumbed should be piped closer to the walls allowing for easier access in the future.
- b) Provide a water-based fire extinguisher in the pool mechanical room and chemical room in place of more common ABC-type extinguishers.



Image 93: Pool Mechanical Room Access

10. Support Spaces and Miscellaneous

Observations and Comments:

- a) There was some observable settling and structural damage to the pool deck and the building, most notably by the admissions area and concessions stand room.
- b) The openings in the facility's perimeter fence are larger than the maximum allowable by regulations (300.18(9)).
- c) The posted maximum bather load for the facility (250) is only approximately 1/3 of the potential bather load allowed by regulations.

Recommendations:

- a) A structural engineer should be consulted to observe and give recommendations for the settling at the support building.
- b) The perimeter fence may need to be replaced depending on whether the code officials' grandfather the facility a variance based on the age of design and

construction. If substantial renovations are done to the facility, a new complaint fence may be required.

- c) The bathroom fixtures are inadequate in quantity to meet code requirements if the full potential bather load was used. Currently, code requires three lavatories for the women's restroom. Only two were provided in the men's and if the same is true on the women's side, code officials may require an additional lavatory be provided or the bather load may need to be reduced further (maximum of 100 bathers).



Image 94: Cracks and Settling in Concession Area



Image 95: Pool Rules and Bather Load Signage

F. OPINION OF PROBABLE COST

The following cost estimates addresses the items identified in this report needing repair, replacement or renovation. The estimates address the physical obsolescence of a pool that was built in the 1930s, as well as safety, and addresses items that are required by the State of Georgia and the Clarke County Health Department. Counsilman-Hunsaker recommends the renovation tasks that the University selects to proceed with are not accomplished one at a time as bundling of tasks will be more cost effective and this efficiency may result in an overall savings in the project cost. Please note that several of the items may either be dependent on another item and some may be more or less intensive based on testing results.

Option #1: Releveled Concrete Gutter				
Item	Unit	Unit Cost	Quantity	Total Cost
Demo the existing gutter edge and releve.	Lump Sum	\$ 292,740	1	\$ 292,740
Sand or hydroblast existing pool plaster and quartz aggregate, including the wall tile and apply new.	Lump Sum	\$ 230,700	1	\$ 230,700
Provide new VGB drain covers	Lump Sum	\$ 3,500	1	\$ 3,500
Allowance for ground penetrating radar and subgrade inspection	Lump Sum	\$ 6,000	1	\$ 6,000
Allowance for pool shell crack and joint repairs	Lump Sum	\$ 25,000	1	\$ 40,000
Provide hydrostatic relief valves in each main drain	Lump Sum	\$ 825	4	\$ 3,300
Provide backwash piping impact flow meter	Each	\$ 250	1	\$ 250
Allowance for replacing corroded pipe hangers, supports, and valves along with piping repairs in the mechanical room	Lump Sum	\$ 13,000	1	\$ 13,000
Provide a compound and pressure gauges for the feature pump	Each	\$ 150	4	\$ 600
Provide one removeable ladder with anchors	Lump Sum	\$ 3,000	1	\$ 3,000
Provide two safety ropes with buoys, end hooks, and anchors	Each	\$ 2,000	2	\$ 4,000
Provide second ADA lift for accessibility requirements	Each	\$ 7,500	1	\$ 7,500
Provide 42" tall portable lifeguard chairs	Each	\$ 1,500	4	\$ 6,000
Provide new high rate sand filtration system for the pool with manual backwash	Lump Sum	\$ 180,000	1	\$ 180,000
Provide a water-based fire extinguisher for the pool mechanical room	Each	\$ 400	1	\$ 400
Core and replace existing recirculation fittings	Lump Sum	\$ 50,000	1	\$ 50,000
Provide NFPA signage and MSDS information for chemicals stored at the site.	Lump Sum	\$ 135	1	\$ 135
Demo the existing main drains. Provide new main drain sumps and PVC suction piping.	Lump Sum	\$ 85,000	1	\$ 85,000

Table 1: Opinion of Probable Repair & Renovation Costs for Option #1

Option #2: New Stainless Steel Gutter				
Item	Unit	Unit Cost	Quantity	Total Cost
Provide a new stainless steel gutter to replace the existing concrete and tile gutter	Lump Sum	\$ 702,000	1	\$ 702,000
Sand or hydroblast existing pool plaster and quartz aggregate, including the wall tile and apply new.	Lump Sum	\$ 223,320	1	\$ 223,320
Provide new VGB drain covers	Lump Sum	\$ 3,500	1	\$ 3,500
Allowance for ground penetrating radar and subgrade inspection	Lump Sum	\$ 6,000	1	\$ 6,000
Allowance for pool shell crack and joint repairs	Lump Sum	\$ 25,000	1	\$ 40,000
Provide hydrostatic relief valves in each main drain	Lump Sum	\$ 825	4	\$ 3,300
Provide backwash piping impact flow meter	Each	\$ 250	1	\$ 250
Allowance for replacing corroded pipe hangers, supports, and valves along with piping repairs in the mechanical room	Lump Sum	\$ 13,000	1	\$ 13,000
Provide a compound and pressure gauges for the feature pump	Each	\$ 150	4	\$ 600
Provide one removeable ladder with anchors	Lump Sum	\$ 3,000	1	\$ 3,000
Provide two safety ropes with buoys, end hooks, and anchors	Each	\$ 2,000	2	\$ 4,000
Provide second ADA lift for accessibility requirements	Each	\$ 7,500	1	\$ 7,500
Provide 42" tall portable lifeguard chairs	Each	\$ 1,500	4	\$ 6,000
Provide new high rate sand filtration system for the pool with manual backwash	Lump Sum	\$ 180,000	1	\$ 180,000
Provide a water-based fire extinguisher for the pool mechanical room	Each	\$ 400	1	\$ 400
Core and replace existing recirculation fittings	Lump Sum	\$ 50,000	1	\$ 50,000
Provide NFPA signage and MSDS information for chemicals stored at the site.	Lump Sum	\$ 135	1	\$ 135
Demo the existing main drains. Provide new main drain sumps and PVC suction piping.	Lump Sum	\$ 85,000	1	\$ 85,000

Table 2: Opinion of Probable Repair & Renovation Costs for Option #2

Option #3: Myrtha Renovation Gutter & Finish System				
Item	Unit	Unit Cost	Quantity	Total Cost
Remove the existing concrete and tile gutter and install a new Myrtha gutter on the pool wall. Provide new gutter and return inlet piping.	Lump Sum	\$ 1,750,000	1	\$ 1,750,000
Premium for installing Myrtha skin throughout the existing pool interior below the Evolution membrane beyond the line item costs above	Lump Sum	\$ 112,500	1	\$ 112,500
Provide new VGB drain covers	Lump Sum	\$ 3,500	1	\$ 3,500
Allowance for ground penetrating radar and subgrade inspection	Lump Sum	\$ 6,000	1	\$ 6,000
Provide 42" tall portable lifeguard chairs	Each	\$ 1,500	4	\$ 6,000
Provide hydrostatic relief valves in each main drain	Lump Sum	\$ 825	4	\$ 3,300
Provide backwash piping impact flow meter	Each	\$ 250	1	\$ 250
Allowance for replacing corroded pipe hangers, supports, and valves along with piping repairs in the mechanical room	Lump Sum	\$ 13,000	1	\$ 13,000
Provide a compound and pressure gauges for the feature pump	Each	\$ 150	4	\$ 600
Provide one removeable ladder with anchors	Lump Sum	\$ 3,000	1	\$ 3,000
Provide two safety ropes with buoys, end hooks, and anchors	Each	\$ 2,000	2	\$ 4,000
Provide second ADA lift for accessibility requirements	Each	\$ 7,500	1	\$ 7,500
Provide NFPA signage and MSDS information for chemicals stored at the site.	Lump Sum	\$ 135	1	\$ 135
Provide new high rate sand filtration system for the pool with manual backwash	Lump Sum	\$ 180,000	1	\$ 180,000
Provide a water-based fire extinguisher for the pool mechanical room	Each	\$ 400	1	\$ 400
Demo the existing main drains. Provide new main drain sumps and PVC suction piping.	Lump Sum	\$ 85,000	1	\$ 85,000

Table 3: Opinion of Probable Repair & Renovation Costs for Option #3

Notes:

- 1) Repair costs do not account for draining, refilling, heating, or chemical treatment costs.
- 2) Refer to other disciplines for any repair costs associated with support spaces, deck, and enclosures.
- 3) The engineer has no control over the cost of labor, materials, equipment, or over the contractor's methods of determining prices or over competitive bidding or market conditions. Opinions of probable costs provided herein are based on the information known to the engineer at this time and represent only the engineer's judgment as a design professional familiar with the construction industry. The engineer cannot and does not guarantee that proposals, bids, or actual construction costs will not vary from its opinions of probable costs.

APPENDIX A – RENOVATION

Given the age of the pool and the issues with the pool structure, an option that may warrant consideration by the University of Georgia is a new manufactured gutter with a PVC membrane finishing the pool interior. A modified “RenovAction” solution would give new life to the Legion Pool for decades to come. This would be a proprietary system from Myrtha Pools. A similar process has been implemented effectively on many older pool shells that exhibit operational and performance issues emblematic of decades of use.

A conventional RenovAction consists of thin rails that are mechanically secured to an existing structure for the installation of modular stainless steel panels and finished with a fiberglass reinforced composite membrane.

A nominal section of Myrtha panel, approximately 12” below the gutter would allow for a desired surface to transition the PVC Evolution membrane onto the existing structure. At the starting and turning ends of the pool, the panel segments may be preferred want to be larger (approximately 36” below the gutter) to allow for the most solid surface for flip turns.

A second option would be to utilize Myrtha “Skin” which provides a complete steel pool solution as the product consists of the same Myrtha steel/PVC technology, but with a thickness of 0.5mm (25 Gauge) and is supplied in rolls. The installation follows a similar procedure as the standard Myrtha Evolution membrane, with expansion joints to allow for any future potential movement of the floor.



Myrtha Skin: Stainless Steel Rolls & Installation

As noted in the preceding Opinion of Cost section, the Myrtha “Skin” option would carry a premium of approximately \$112,500. Both options would come with a 25-year warranty on the structure and 10-year warranty for waterproofing integrity.

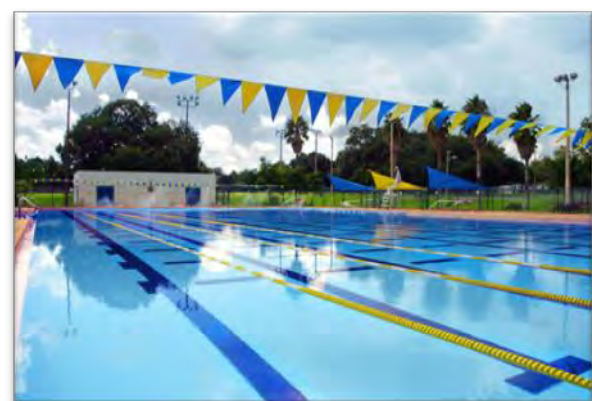
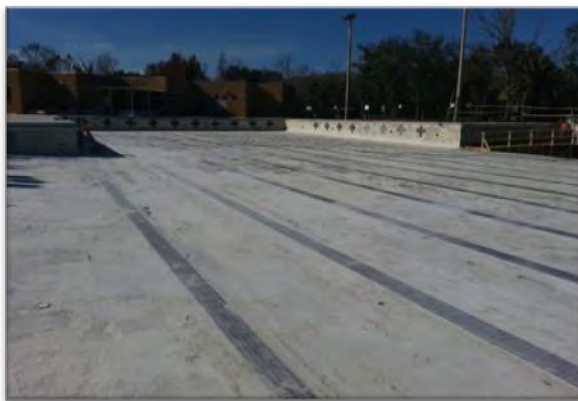
The materials will come from Italy, so there is a measurable lead time that needs to be built into the timeline for approvals, fabrication, and shipment. To get a feeling for the procurement time needed, on a recent project for a 50 meter pool RenovAction, Myrtha requested 120 days from time of initial deposit until the materials were on site. Once on site, the actual installation could start

and finish easily within one off-season. As mentioned, the RenovAction system would receive a new gutter around the pool's full perimeter, as well new main drain sumps and return fittings.

Below are before and after example images from some other RenovAction installations in the U.S.



Before and After Images #1: Rochester Recreation Center – Rochester, MN



Before and After Images #2: Simpson Park – Lakeland, FL



Before and After Images #3: Miami Dade College – Miami, FL



Before and After Images #4: Memorial Pool – Pasco, WA

APPENDIX B – FACILITY REPLACEMENT

As part of the updated assessment, Counsilman-Hunsaker was requested to look at the cost for replacing the existing facility in its entirety. Doing so would ensure that the Legion Pool could continue to serve the University of Georgia for at least 40-50 years, address the existing issues, and provide modern outdoor pool amenities. For this replacement exercise, it was assumed that the pool would remain the same size and serve the same function. The pavilion would also remain the same size, as would the deck. The support building would grow in size by approximately 1,500 SF. And existing parking would remain as-is.

CHART LEGION POOL PROJECT COST: FULL REPLACEMENT					
Description	Unit	Amount	Unit Cost	Opinion of Cost	Opinion of Cost
Support Spaces		5,635	\$457	\$2,576,545	\$2,576,545
Front Desk	Sq. Ft.	200	\$383	\$76,500	
Concessions	Sq. Ft.	300	\$563	\$168,750	
Offices (Lifeguard + Admin)	Sq. Ft.	250	\$383	\$95,625	
Locker Rooms	Sq. Ft.	2,000	\$563	\$1,125,000	
Family Changing Rooms	Sq. Ft.	300	\$563	\$168,750	
Outdoor Pool Mechanical Room	Sq. Ft.	1,200	\$315	\$378,000	
Building Mechanical / Electrical / Janitor	Sq. Ft.	150	\$315	\$47,250	
Storage (Building / Pool)	Sq. Ft.	500	\$315	\$157,500	
Circulation and Walls (25%)	Sq. Ft.	735	\$489	\$359,170	
Outdoor Aquatic Center		27,370	\$191	\$5,235,384	\$5,235,384
Outdoor Lap Pool	Sq. Ft.	12,920	\$342	\$4,418,640	
Shade Pavillion	Qty.	4,100	\$60	\$246,000	
Outdoor Deck	Sq. Ft.	10,350	\$29	\$298,080	
Overhead Lighting	Sq. Ft.	27,370	\$7	\$197,064	
Fencing	Linear Ft.	600	\$126	\$75,600	
Unit		Sq. Ft.	Cost	Opinion of Cost	Opinion of Cost
Total Building Construction Costs		33,005	\$237	\$7,811,929	7,811,929
Demolition Allowance				\$250,000	\$250,000
Site Construction Costs (existing parking, landscaping, utilities, walks - assuming normal site conditions)				\$528,080	\$528,080
Furniture, Fixtures, Equipment				\$199,000	\$199,000
Subtotal				\$8,789,009	\$8,789,009
Escalation Allowance (1 year)		5.0%		\$439,450	\$439,450
Contingency (Design / Construction)		10.0%		\$922,846	\$922,846
Design Fees, Surveys, Permitting		12.0%		\$1,218,157	\$1,218,157
Opinion of Probable Cost				\$11,369,462	\$11,369,462
Total Estimated Project Costs:			\$344	\$11,369,462	\$11,400,000
Estimate Current as of:		7/17/2025			
Source: Counsilman-Hunsaker					

ATTACHMENT H

UGA Today article “UGA to redevelop Legion Pool, Legion Field to better serve and support students”, September 25, 2025



UGA to redevelop Legion Pool, Legion Field to better serve and support students

Sep 25, 2025

Campus News



Concept view of a portion of Legion Field looking south with the existing fence and stage removed, new security lighting, amphitheater elements, and pathway connections to the new West Campus Dining, Learning, and Well-being Center (which is under construction and opening Fall 2026).

Project aims to create a more welcoming and functional space for students

The University of Georgia plans to redevelop the Legion Pool and Legion Field area to better serve and support its students. The decision comes upon the recommendation of a working group that has considered the highest and best use of this space, located in the heart of the Athens campus, for the last six months.

“Our in-depth study demonstrated that fewer than 2.5 percent of our students use Legion Pool, which is only open from late May to early August, yet its operation is predominantly supported by the Student Activity Fee,” said Dean of Students Eric Atkinson, who chaired the working group. “In addition, the pool loses an estimated 24,000 gallons of water a day through leaks and evaporation and loses nearly \$90,000 per year, with this operating deficit covered by Student Activity Fee reserves. For all these reasons—usage, sustainability and cost of maintenance and operation—our working group concluded that an alternative use provided the best option for our students.”

That alternative is to remove Legion Pool, its pool house and the Legion Field concert stand, while Legion Field will be enhanced to create an expanded community green space and an outdoor amphitheater using the site’s natural topography. The project also will create 70 additional parking spaces—a critical need in a busy area of campus where thousands of students live and eat in residence and dining halls, take classes at the Miller Learning Center and the Business Learning Community, and enjoy the amenities of the Tate Student Center.

The redesigned Legion Field area is planned for completion in Fall 2026, complementing the opening of the adjacent West Campus Dining, Learning, and Well-being Center.

“It is incredibly exciting to see this vital area of campus redeveloped to better support our student body,” said Vice President for Student Affairs Michelle Cook. “By creating a beautiful green space and gathering area, as well as an expanded venue for events and concerts, this reimagined site will foster enhanced well-being and connection among our students while providing a unique asset for our more than 850 student organizations.”

In reaching its recommendation, the working group analyzed Legion Pool and Legion Field usage reports, financial records, and a Counsilman-Hunsaker swimming pool audit, as well as a Legion Field planning study and a historical resource study. Members—which included several student leaders as well as the university architect, associate vice president for student well-being, and associate vice president for public safety, among others—also toured the site, conducted a benchmarking analysis, and solicited input from student leaders and campus units impacted in the area. The group’s final report was submitted on August 1.

In recent years, despite rising enrollment and the need for additional community green spaces on campus, Legion Field and Legion Pool have been increasingly underutilized. In its current form, Legion Field is unused approximately 92 percent of the time, hosting just 26 scheduled events per year. Meanwhile, Legion Pool has experienced a significant decline in visits and revenue in recent years. Annual visits to Legion Pool have dropped more than 30

percent since 2019, with approximately half of the visits coming from UGA summer camps and about 20 percent from the local community.

Beginning next season, UGA summer camps will have the option to relocate their swimming activities to the three indoor pools at Gabrielson Natatorium in the Ramsey Student Center. Meanwhile, UGA faculty and staff can continue to purchase passes to the Ramsey Student Center for themselves and their families, as they have in the past.

“Many of our students live off-campus in apartment complexes that feature swimming pools, and Athens–Clarke County also offers several outdoor pools for community use,” said Gwynne Darden, associate vice president and university architect. “A compelling factor to those of us charged with stewardship of University resources is the massive amount of water being wasted each day.”

Over the last five years, Legion Pool’s total net revenue losses have amounted to \$438,645, with the pool realizing a net loss of almost \$90,000 in Fiscal Year 2025 alone. When the Legion Field site is redeveloped, Student Activity Fee reserves previously used to offset these annual deficits will be redirected to support initiatives that directly benefit students, such as the UGA Food Pantry, among other programs.

“Legion Pool is open during the summer months but closes by the time most students come back to campus,” said Student Government Association President John Neely, who served on the working group. “The Student Activity Fee is meant to support the student body, and this redevelopment plan will do exactly that. This beautiful green space will act as the ‘backyard’ of several first-year residence halls, offering a place for students to socialize, study, and relax on campus.”

“Most students are not aware of Legion Pool and Legion Field, so they don’t take advantage of this part of campus,” said Rock Rogers, immediate past president of the Student Government Association and now a first-year UGA law student, who also served on the working group. “I am excited to see this redevelopment transform a rarely used area into a place that better serves students, brings them together, and helps them make friendships and wonderful memories.”

A historic resource study commissioned by UGA’s Office of University Architects for Facilities Planning recommends that Legion Pool, its pool house and Legion Field qualify for eligibility on the National Register of Historic Places. Because of this possibility, the University will follow appropriate procedures required by the State Historic Preservation Office, the Georgia Environmental Policy Act, and the University System of Georgia. The reenvisioned area will retain the name, Legion Field.

“As the working group report noted, our students simply haven’t been using Legion Pool for a number of years, and the condition assessment indicates that it would be very costly to bring the pool up to current industry standards,” noted Ryan Nesbit, vice president for finance and administration. “Revitalization of this central area as a communal greenspace

and for much-needed parking offers long-term uses that will be heavily utilized by our students.”

The report of the Working Group on the Future of Legion Pool/Legion Field can be found [here](#).

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ATTACHMENT I

UGA Today article “Revitalized Legion Field to enhance the student experience”, October 10, 2025



Revitalized Legion Field to enhance the student experience

Oct 10, 2025

Campus News



Concept view of the redeveloped Legion Pool and Legion Field area looking north with new security lighting, amphitheater elements, and pathway connections.

Q&A with UGA Dean of Students Eric Atkinson and University Architect Gwynne Darden

The University of Georgia recently announced plans to redevelop the Legion Pool and Legion Field area to better serve and support students. The project will transform a vital part of

T campus into an enhanced community green space that promotes well-being, connection, and sustainability. To learn more about the planning process and goals behind this project, we spoke with Dean of Students Eric Atkinson and University Architect Gwynne Darden.

Q: Can you tell us more about the project to redevelop Legion Pool and Legion Field?

Eric Atkinson: We're very excited about how this project will enhance the living-learning experience of our students. As part of the redevelopment, Legion Pool, its pool house, and the existing concert stand will be removed, and Legion Field will be significantly expanded to create a beautiful and functional community green space. The project also includes a new outdoor amphitheater that will take advantage of the site's natural topography, creating a versatile venue for concerts, programs, and events.

Gwynne Darden: The Legion Field design emphasizes both gathering and reflection — spaces where students can meet friends, relax between classes, or enjoy performances in a scenic, shaded setting. In addition, the plan provides approximately 70 new parking spaces designated for students living and learning in the area, which is highly utilized by thousands of students every day. Together with the nearby West Campus Dining, Learning, and Well-being Center, these projects will transform the west campus area into one of the university's most active hubs for student life and engagement.



Q: How will this project benefit students?

Eric Atkinson: This project offers multiple benefits for students and, ultimately, for our entire academic community. Legion Field sits in a very busy area surrounded by residence halls, dining facilities, academic buildings, and student support centers. Expanding the site will provide a central green space that serves as a gathering point for students who live, learn, and participate in activities throughout this thriving part of campus.

We know that more than half of college students nationally report mental health challenges, and the research — as well as our own student feedback — clearly shows that access to open, natural spaces fosters greater belonging and improved well-being. Green spaces allow students to pause, reflect, and connect with one another, all of which are vital to success both inside and outside the classroom.

The new amphitheater will also provide a much-needed venue for performances, service projects, and social events. With more than 900 registered student organizations, providing flexible outdoor programming space near residence halls and major dining facilities will make it easier for students to participate in campus life.

Even with the significant expansion of Legion Field, the project is also able to add new student-designated parking — something our students have repeatedly identified as a top need. Access to parking affects students' ability to commute to and from classes, jobs, and service activities across the Athens community, and we are pleased that our students' strong and consistent feedback about parking directly shaped this project.

Q: How was this plan created?

Eric Atkinson: The plan was developed by a campus working group, which I chaired, convened in February. This group was charged with carefully evaluating the Legion Pool and Legion Field area and identifying the site's highest and best use to enhance students' living and learning experience.

Over six months, the working group analyzed usage reports, financial records, and a swimming pool audit; conducted a benchmarking study of outdoor recreation facilities at peer and aspirational institutions; and solicited input from student leaders and other campus units impacted in the area. The group also toured the area and reviewed environmental and historical studies associated with the site.

I am extremely proud of the working group and the substantial time and effort they devoted to this project. They thoughtfully considered a range of scenarios — including maintaining the site in its current state and making major capital investments to repair existing facilities. Ultimately, the data showed that Legion Pool's significant annual operating deficits — covered entirely by student fees — combined with its shrinking utilization and negative environmental impact made it unsustainable to operate in its current form.

Renovating the pool and its associated facilities would have required millions in capital investment to serve a tiny segment of our student body. The working group agreed that transforming the area into an expanded and revitalized green space would provide far greater long-term benefits for all students.

Q: Why move forward with redevelopment now?

Gwynne Darden: The upcoming opening of the West Campus Dining, Learning, and Well-being Center created a unique opportunity to reimagine the surrounding area. The expanded Legion Field will seamlessly connect with this impressive new facility, providing a natural extension for gathering, recreation, and co-curricular programming for our students.

Expanding community green spaces has been a longstanding university priority, and this project advances that goal while addressing tremendous infrastructure and sustainability concerns. Legion Pool has major, long-term structural deficiencies, including leaks that resulted in the loss of more than 24,000 gallons of water a day. Repairing these issues would have been very costly and would not have addressed the site's limitations in serving our student body.

Eric Atkinson: The working group's recommendation also reflects careful consideration of fairness and fiscal responsibility. Legion Pool's usage has declined steadily for more than two decades, with total visits among all user groups down nearly 55% since 1998 and over 30% since 2019. Students are the smallest user group and represent only 10% of the pool's visitors, and fewer than 2.5% of the student body has used the pool in recent years.

Despite low utilization, students have largely funded the pool's operating costs and fully absorbed its \$438,000 cumulative deficit over the past five years — including nearly \$90,000 last year alone. Legion Pool has incurred operating deficits for 24 consecutive years. That model simply isn't sustainable. Students and their families expect the university to use their hard-earned resources wisely, and this plan honors that trust and expectation. By redirecting student activity funds to projects that benefit the broader student community, we are ensuring a greater return on their investment.

Q: How will student fees previously used for Legion Pool be reallocated?

Eric Atkinson: One of the most important discussions among the working group centered on how to ensure that student activity fees directly benefit students. The working group's student representatives felt very strongly that these resources should support initiatives that meet students' most pressing needs.

Under this plan, the student activity fee reserves that previously covered Legion Pool's operating costs and deficits will now be redirected to support programs that have a direct and measurable impact on students — such as the UGA Food Pantry, which provides essential food items and basic supplies to students experiencing food insecurity.

These resources are critical. Today, almost 20% of UGA students receive Federal Pell Grants, over a quarter of students have unmet financial need, and more than 1,300 requests for emergency assistance were made by our students last year. Redirecting these limited funds to areas like the Food Pantry, emergency aid, and wellness programming will make a tangible difference in the lives of our students.

Q: What are the next steps?

Gwynne Darden: Some preliminary work on the site may begin as early as this year. We are aiming for the redeveloped Legion Field to open in Fall 2026 as a dynamic new space that reflects the university's commitment to student success, sustainability, and well-being. When it's completed, this expanded area will serve as a space for gathering, community-building, and wellness that signals UGA's lasting commitment to addressing the needs of students.

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ATTACHMENT J

BCP Environmental Pre-Demolition Hazardous Building Materials Survey Report

Pre-Demolition Hazardous Building Materials Survey Report



October 27, 2025

The University of Georgia
Legion Pool Facility (Building #2604)
Athens, Georgia

Prepared For:

Ms. Maggie Discher
The University of Georgia
Office of the University Architects for Facilities Planning
1180 East Broad Street
Athens, Georgia 30602

BCP ENVIRONMENTAL, LLC

P. O. Box 871, Braselton, Georgia 30517

October 27, 2025

Ms. Maggie Discher
The University of Georgia
Office of University Architects
1180 East Broad Street
Athens, Georgia 30602

Subject: Pre-Demolition Hazardous Building Materials Survey Report
The University of Georgia
Legion Pool Facility (Building # 2604)
Athens, Georgia

Dear Ms. Discher,

BCP Environmental, LLC has completed this report concerning the pre-demolition hazardous building materials survey (asbestos, lead paint screening, and universal wastes, such as mercury-containing fluorescent bulbs and PCBs-containing light ballasts) at the above referenced site.

We understand this survey was requested due to planned demolition of the Legion Pool facility (pool, pool house, shade pavilion & concert stand). Category I non-friable asbestos-containing materials (ACMs), lead paint, mercury-containing fluorescent light bulbs were identified at the site. Please see attached report for details.

We appreciate the opportunity to be of service to you on this project. If you have any questions about information in this report, or if I can be of further assistance, please feel free to contact me.

Sincerely,
BCP Environmental, LLC
Brad Pickerel
Brad Pickerel
Owner/Sr. Project Manager

Cell (770) 841-7090

Email: bcpenviro@gmail.com

BCP Environmental, LLC
P.O. Box 871
Braselton, Georgia 30517

October 27, 2025

Ms. Maggie Discher
The University of Georgia
Office of University Architects
1180 East Broad Street
Athens, Georgia 30602

Subject: Pre-Demolition Hazardous Building Materials Survey Report
The University of Georgia
Legion Pool Facility (Building # 2604)
Pool, Pool House, Shade Pavilion, & Concert Stage
Athens, Georgia

Introduction:

This report presents the results of the interior & exterior pre-demolition hazardous building materials survey at the above referenced site.

This inspection was performed by Mr. Bradley Pickerel, a current trained accredited Asbestos Hazard Emergency Response Act (AHERA) asbestos building inspector and current EPA trained lead building inspector. BCP Environmental, LLC conducted the site investigation on October 13, 2025.

Purpose:

The purpose of this pre-renovation hazardous building materials survey was to conduct comprehensive interior and exterior NESHAP asbestos survey, lead paint screening, and visual inspection for universal wastes (fluorescent bulbs & PCBs ballasts) in regard to planned demolition at the above referenced site.

The observed suspect asbestos-containing materials (ACMs) were:

- 12x12 Inch Tan Vinyl Floor Tile & Black Mastic (FTM)
- Gypsum Wallboard & Joint Compound (WBJC) in Ceilings
- Acoustical Ceiling Tile (ACT)
- Fiberglass Pipe Wrap & Mastic (Runs & Elbows)
- Exterior Window Glazing
- Exterior Window Frame Caulk
- Exterior Pool House Brick/Concrete Slab Foundation Caulk
- Exterior Roof Parapet & Penetration Flashing
- Exterior Asphalt Built-Up Roofing (BUR) & Felts under TPO Roofs
- Exterior Asphalt Roof Shingles & Felt Paper
- Exterior Expansion Joint Concrete Slab Caulk (Gray)
- Exterior Epoxy Flooring
- Metal Sink Undercoating
- Pool Liner Plaster Coatings & Sealants
- Vinyl Cove Base Mastic
- Exterior Pool Ceramic Tile Thin-Set & Grout

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The observed suspect lead painted building components were:

- Structural Steel Framing (Concert Stage)
- Metal Door Frames (Pool House)
- Water Tanks (Pool House Mech. Room)
- Pool Lining (Pool)
- Brick Walls (Pool House)
- Wood Columns (Pool House & Pavilion)
- CMU Block Walls (Pool House & Perimeter Knee Wall around Pool)
- Wood Fascia (Pool House)
- Concrete Arch Blocks (Pavilion)
- Wood Ceiling Decking & Rafters (Pavilion)

This inspection was conducted in general accordance with Environmental Protection Agency (EPA) AHERA guidelines and will satisfy the Georgia Environmental Protection Division (GAEPD) requirements for pre-renovation and pre-demolition inspections.

EPA Regulation 40 CFR 61, Subpart M, National Emission Standards for Hazardous Air Pollutants (NESHAP), prohibits the release of asbestos fibers to the atmosphere during demolition and renovation activities. The asbestos NESHAP requires that potentially regulated ACM be identified, classified and quantified prior to planned disturbances or renovation activities.

Bulk Samples Survey Protocol:

1. During the inspection, the various building construction materials were categorized into "homogeneous areas" based upon material types, approximate dates of construction, building system/function and appearance.
2. Conducted an interview with Ms. Maggie Discher (OUA Project Manager) to elicit information regarding the survey.
3. The scope of work was to conduct comprehensive interior and exterior asbestos survey for the purpose of demolition.
4. A brief walk through of the target areas to be surveyed allowed conclusions to be made concerning the number of samples needed and the location of the bulk to be collected.
5. A visual inspection was conducted to identify the locations of suspect asbestos containing materials and physically touched the material to determine if it was to be classified as friable (easily crumbled with hand pressure and reduced to powder form) or non-friable. Suspect materials were catalogued according to their intended use. These categories include surfacing materials, thermal system insulation (TSI) and/or miscellaneous.
6. Bulk sampling was conducted in accordance with the procedures outlined in AHERA (40 CFR 763.86 Sampling). These procedures required a random sampling method, which was used to select sampling locations from each homogeneous sampling area. A homogeneous area is defined as an area of surfacing, TSI or miscellaneous material that is uniform in color and texture.

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7. The bulk samples were wetted to minimize the release of fibers into the air, sealed within a sample baggie and labeled with an identification number. Bulk sample locations were recorded on attached floor plan.

Analytical Laboratory Information:

All bulk samples were analyzed by Polarized Light Microscopy (PLM) EPA 600/R-93/116. The Chain-of-Custody forms and asbestos bulk analysis results are attached. The bulk samples were analyzed by an independent third-party accredited laboratory Scientific Analytical Institute (SAI).

SAI is an accredited by the National Institute of Standards and Technology (NIST) National Voluntary Accreditation Program (NVLAP) for laboratories analyzing bulk materials by PLM. Paint chip samples were analyzed by Flame AA.

Pre-Demolition NESHAP Asbestos Survey Results:

A total of fifty-nine (59) bulk samples including sample layers were collected from twenty-four(24) homogeneous areas (HA) suspect for ACM that may be disturbed during the project. Any building materials containing 1% or more asbestos is considered asbestos-containing material (ACM). The following building materials tested positive for asbestos and are considered ACM:

SAMPLE ID #	DESCRIPTION OF MATERIAL	LOCATION	CONCENTRATION & TYPE OF ACM	NESHAP CATEGORY	ESTIMATED QUANTITY
LP-1 LP-2	BLACK MASTIC UNDER VCT	POOL HOUSE – OFFICE ROOMS 1 & 2 AND STORAGE ROOM 7	5% CHRYSOTILE	CATEGORY I NON-FRIABLE ACM	700 SQUARE FEET (SF)
LP-18 LP-19 LP-20	ASPHALT BUILT-UP ROOFING UNDER TPO	POOL HOUSE (2 ROOFS)	2%-5% CHRYSOTILE	CATEGORY I NON-FRIABLE ACM	1,800 SF
PRIOR ACM SURVEY (2012)	GRAY EXPANSION JOINT CAULK	CONCRETE SLAB AROUND POOL	15% CHRYSOTILE	CATEGORY I NON-FRIABLE ACM	500 LF

Notes:

1. No asbestos detected in remaining bulk samples.

Regulatory Overview & Recommendations:

Friable ACM, Category I and Category II non-friable ACM which is in poor condition and has become friable or which will be subjected to drilling, sanding, grinding, cutting, or abrading and which could be crushed or pulverized during anticipated demolition activities are considered regulated ACM (RACM). RACM must be removed prior to renovation or demolition activities, which will disturb the materials. The owner or operator must provide the Georgia Environmental Protection Division (GA EPD) with written notification at least 10 working days prior to the commencement of demolition activity which will include the disturbance of at least 10 linear feet or 10 square feet of RACM. Removal of RACM must be conducted by a GA EPD licensed asbestos abatement contractor. All ACM must be disposed at a permitted landfill. The Georgia Department of Natural Resources (DNR) provides the GA EPD authority for regulating asbestos containing waste.

Phone: (770) -841-7090

Email: bcpenviro@gmail.com

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Lead-Based Paint Screening Results:

BCP Environmental, LLC collected fourteen (14) random, composite suspect paint chips from interior and exterior painted building components that may be disturbed during demolition and tested by an independent certified laboratory.

The EPA defines lead-based paint as "paint or other surface coatings that contain lead equal to or exceeding 1.0 milligram per square centimeter or *0.5 percent by weight* or 5000 parts per million (ppm) by weight."

Lead-containing paint (LCP) is any amount of lead defined by OSHA Lead Standard for the Construction Industry, Title 29 Code of Federal Regulations 1926.62.

The following painted building components are considered LBP:

Sample ID #	Component Type	Color	Location	Concentration % by Weight
LP-L6	Wood Columns	White	Pool House	4.8%
LP-L9	Wood Columns	White	Pavilion	11%
LP-L10	Wood Fascia	White	Pool House	2.1%
LP-L12	Wood Ceiling Deck & Rafters	White	Pavilion	26%

The following painted building components are considered lead-containing paint (LCP):

Sample ID #	Component Type	Color	Location	Concentration % by Weight
LP-L3	Metal Water Tanks	Blue	Pool House – Basement	0.030%
LP-L11	Concrete Arch Walls	White	Pavilion	0.015%
LP-L14	Brick Wall	Tan	Pool House – Rear Storage Room 10	0.15%

Note: All remaining paint chip samples below detectable limits. LBP identified on interior painted brick walls (1.8% by weight) in Storage Room 15 per review of attached 2012 HAZMAT survey report.

Regulatory Overview & Recommendations (LBP):

Where lead is present at any level on concentration (LCP), the Federal regulation (Occupational Safety and Health Administration 29 CFR 1910.62) requires employers to perform assessment exposure monitoring during any demolition that might create lead dust. If no employee is exposed to the action level during this initial assessment, further monitoring can be suspended. Worker exposure to lead, a common concern during renovation, is not typically a concern during wholesale demolition provided that components are not individually treated.

When lead-based painted components are removed and disposed or when lead-based painted structures are demolished (non-residential buildings), the wastes generated from such activities are regulated as solid wastes under the Resource Conservation and Recovery Act (RCRA).

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Braselton, Georgia 30517

In order to determine whether solid wastes are hazardous under the RCRA, the Toxicity Characteristic Leaching Procedure (TCLP) (analytical lab procedure) is used. Under RCRA, solid wastes containing 5 mg/L or greater lead as determined by TCLP analysis are regulated hazardous wastes and must be treated and disposed of accordingly. Non-residential wastes that do not exceed the regulatory threshold of 5 mg/L lead as determined by TCLP, this waste may be disposed of in a permitted Municipal Solid Waste (MSW) landfill or a permitted Construction & Demolition (C&D) landfill.

Using the "Rule of 20" as it pertains to TCLP analysis, it is not possible for any of the painted components tested by BCP Environmental to fail the TCLP test. For a painted component to possibly fail the TCLP test it must have a total concentration of 0.25% by weight or greater. This means that the expected waste stream is non-hazardous and may be treated as C&D waste.

Universal Waste – Polychlorinated Biphenyls (PCBs) Light Ballasts, & Mercury-Containing Fluorescent Light Bulbs & Thermostats:

A visual assessment was conducted in the target area for PCBs-containing fluorescent light fixture ballasts, mercury-containing fluorescent light bulbs and thermostats. Visual inspections of random fluorescent light fixtures were performed in the target buildings. BCP Environmental, LLC recommends all identified hazardous materials be properly removed and disposed of off-site according to all applicable local, state and federal rules and regulations:

Total Estimated No. of PCBs-Containing Lamp Ballasts & Locations	Total Estimated No. of Mercury-Containing-Fluorescent Bulbs/Thermostats & Locations
2 – Storage Room 10	76 – 4 Foot Bulbs (Pool House & Pavilion) NONE – 8 Foot Bulbs 2 - Mercury Vapor (Exterior Pool House)

All fluorescent light fixtures should be checked for PCB-containing lamp ballasts. Not all fluorescent light fixtures were checked for PCBs ballasts, only random homogeneous fixtures during site investigation.

Limitations & Conclusions:

This survey was conducted with the best information available at the time. The UGA Facilities Management Division (FMD) Asbestos "Blue Book" was also reviewed for past abatements and surveys. Hidden ACM may still be present behind structures. All such unidentified materials should be treated as assumed ACM. The assumed ACM should be sampled to confirm the presence of asbestos prior to the demolition activities.

Subcontractors and employees working within the target areas at the site should be aware of the locations of the ACM and the possibility of concealed suspect ACM that could be found during demolition activities. We cannot, guarantee that all potential ACM & LBP/LCP and other hazardous building materials, including quantities, has been located. We do warrant, however, that the investigations and methodology reflect our best efforts based upon the prevailing standard of care in the environmental industry. This report is not

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Braselton, Georgia 30517

intended to serve as a bidding document and should be field verified. This survey pertains to the target structures identified in this report only.

Acknowledgement:

BCP Environmental, LLC appreciates the opportunity to work with you on this project and if you have any questions, please contact me @ (770) 841-7090.

Sincerely,

Brad Pickerel

Brad Pickerel

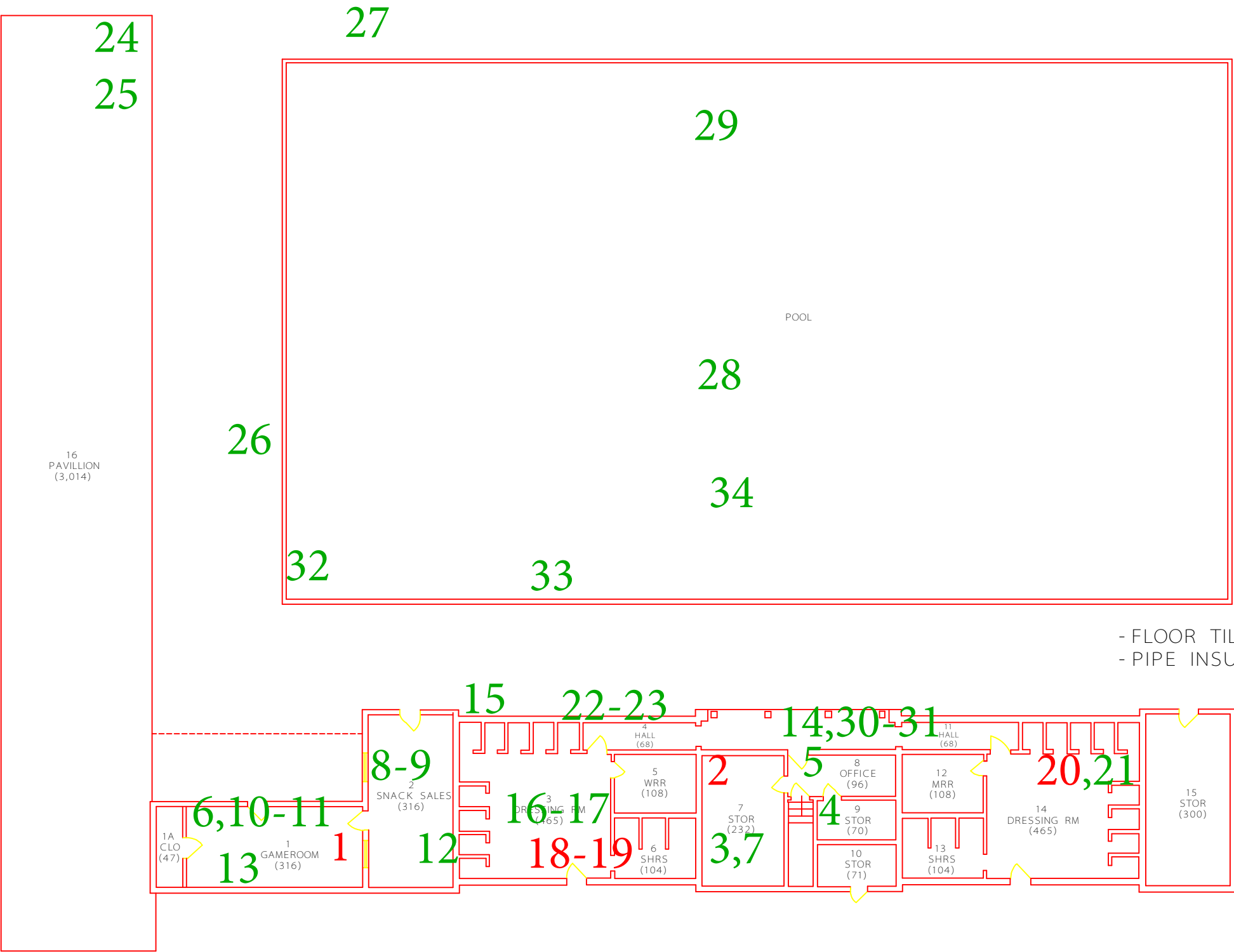
Project Industrial Hygienist
BCP Environmental, LLC

Bulk Sampling Location Drawing

Numbers in **Green** on Drawing – No Asbestos Detected

Numbers in **Red** on Drawing – Asbestos-Containing Material (ACM)

1. ACM Black Mastic under VCT
2. ACM Black Mastic under VCT
3. Gypsum Wallboard & Joint Compound (WBJC) Ceiling
4. Gypsum WBJC Ceiling
5. Gypsum WBJC Ceiling
6. Vinyl Cove Base Mastic
7. Vinyl Cove Base Mastic
8. Fiberglass Pipe Wrap
9. Fiberglass Pipe Wrap
10. Acoustical Ceiling Tile (ACT)
11. ACT
12. ACT
13. Metal Sink Undercoating
14. Exterior Window Glazing
15. Exterior Pool House Brick to Slab Seam Caulk
16. Roof Flashing Caulk on Brick Parapet
17. Penetration Roof Flashing
18. ACM Roof Felt on Concrete Deck under TPO/Built-Up Roofing
19. ACM Main Roof Field - Built-Up Roofing under (BUR) TPO
20. ACM BUR - Main Roof Field under TPO
21. Penetration Roof Flashing
22. Asphalt Roof Shingle & Felt
23. Bottom Older Roof Felt
24. Bottom Older Roof Felt
25. Asphalt Roof Shingle & Felt
26. Expansion Joint Caulk on Concrete Slab (PRIOR ACM SURVEY CAULK IS ACM)
27. Expansion Joint Caulk on Concrete Slab (PRIOR ACM SURVEY CAULK IS ACM)
28. Pool Plaster Liner
29. Pool Plaster Liner
30. Epoxy Sealant on Concrete
31. Exterior Window Frame Caulk
32. Ceramic Tile Grout (Pool)
33. Pool Sealant Caulk (Seam Between Ceramic Tile Walls & Bottom of Pool)
34. Pool Liner by Drains



- FLOOR TILE PRESUMED ASB.
- PIPE INSUL. PRESUMED ASB.

LEGEND

100 ROOM NUMBER
OFFICE ROOM USE
(123) SQUARE FOOTAGE



REV. NO.	DESCRIPTION	BY	DATE



The University of Georgia
Engineering Department

Physical Plant

FACILITIES INVENTORY SECTION			
TITLE LEGION POOL SERVICE	BLDG. NO. 2605	SHEET 1	
	DRAWN JN		
	DATE 10 - 99	OF 1	

CAD FILE 2605-1ST.DWG

Photographs Log



3. ACM asphalt built-up (BUR) roof under TPO on Pool House (Flat Roof 1)



4. ACM BUR under TPO on Pool House (Flat Roof 2)



5. Typical fluorescent mercury-containing bulbs inside Pool House & suspect PCBs lamp ballast in Storage Room 10



6. ACM gray expansion joint caulk on concrete slab around pool (per 2012 HAZMAT survey)



7. Mercury vapor bulb on pool house building



8. Exterior white damaged/peeling LBP on pavilion wood framing



9. Typical mercury-containing fluorescent light bulbs in enclosed pool house structure.



10. No hazardous materials identified with the existing concert stage

Laboratory Results



Bulk Asbestos Analysis

By Polarized Light Microscopy
EPA Method: 600/R-93/116 and
40 CFR, Part 763, Subpart E, App.E



Customer: BCP Environmental
PO Box 871
Braselton, GA 30517

Attn: Brad Pickerel

Lab Order ID: 10094552

Analysis: PLM

Date Received: 10/16/2025

Date Reported: 10/20/2025

Project: UGA-Legions Pool

Sample ID	Description	Asbestos	Fibrous Components	Non-Fibrous Components	Attributes
Lab Sample ID	Lab Notes				Treatment
LP-1 - A	Floor tile & mastic- 12"	None Detected		100% Other	Off-white
10094552_0001	tile				Non-Fibrous
					Homogeneous
					Dissolved
LP-1 - B	Floor tile & mastic- 12"	5% Chrysotile		95% Other	Black
10094552_0035	mastic				Non-Fibrous
					Homogeneous
					Dissolved
LP-2 - A	Floor tile & mastic- 12"	None Detected		100% Other	Off-white
10094552_0002	tile				Non-Fibrous
					Homogeneous
					Dissolved
LP-2 - B	Floor tile & mastic- 12"	Not Analyzed			
10094552_0036	mastic				
LP-3 - A	Gypsum wallboard & joint compound- ceiling	None Detected	10% Cellulose	90% Other	White
10094552_0003	wallboard				Non-Fibrous
					Homogeneous
					Crushed
LP-3 - B	Gypsum wallboard & joint compound- ceiling	None Detected		100% Other	White
10094552_0037	joint compound				Non-Fibrous
					Homogeneous
					Crushed
LP-4 - A	Gypsum wallboard & joint compound- pool house	None Detected	10% Cellulose	90% Other	White
10094552_0004	wallboard				Non-Fibrous
					Homogeneous
					Crushed
LP-4 - B	Gypsum wallboard & joint compound- pool house	None Detected		100% Other	White
10094552_0038	joint compound				Non-Fibrous
					Homogeneous
					Crushed

Disclaimer: Due to the nature of the EPA 600 method, asbestos may not be detected in samples containing low levels of asbestos. We strongly recommend that analysis of floor tiles, vermiculite, and/or heterogenous soil samples be conducted by TEM for confirmation of "None Detected" by PLM. This report relates only to the samples tested and may not be reproduced, except in full, without the written approval of SAI. This report may not be used by the client to claim product endorsement by NVLAP or any other agency of the U.S. government. Analytical uncertainty available upon request. Scientific Analytical Institute participates in the NVLAP Proficiency Testing program. Unless otherwise noted blank sample correction was not performed. Estimated MDL is 0.1%.

William Blackburn (50)

Analyst

Nathaniel J. Durham

Approved Signatory



Bulk Asbestos Analysis

By Polarized Light Microscopy
EPA Method: 600/R-93/116 and
40 CFR, Part 763, Subpart E, App.E



Customer: BCP Environmental
PO Box 871
Braselton, GA 30517

Attn: Brad Pickerel

Lab Order ID: 10094552

Analysis: PLM

Date Received: 10/16/2025

Date Reported: 10/20/2025

Project: UGA-Legions Pool

Sample ID	Description	Asbestos	Fibrous Components	Non-Fibrous Components	Attributes
Lab Sample ID	Lab Notes				Treatment
LP-5 - A	Gypsum wallboard & joint compound- pool house	None Detected	10% Cellulose	90% Other	White Non-Fibrous Homogeneous
10094552_0005	wallboard				Crushed
LP-5 - B	Gypsum wallboard & joint compound- pool house	None Detected		100% Other	White Non-Fibrous Homogeneous
10094552_0039	joint compound				Crushed
LP-6 - A	Cove base mastic	None Detected		100% Other	Tan Non-Fibrous Homogeneous
10094552_0006	cove base				Ashed
LP-6 - B	Cove base mastic	None Detected		100% Other	Brown Non-Fibrous Homogeneous
10094552_0040	mastic				Ashed
LP-7 - A	Cove base mastic	None Detected		100% Other	Tan Non-Fibrous Homogeneous
10094552_0007	cove base				Ashed
LP-7 - B	Cove base mastic	None Detected		100% Other	Brown Non-Fibrous Homogeneous
10094552_0041	mastic				Ashed
LP-8 - A	Fiberglass pipe wrap	None Detected	10% Fiber Glass	90% Other	White Non-Fibrous Homogeneous
10094552_0008	wrap				Ashed
LP-8 - B	Fiberglass pipe wrap	None Detected	99% Fiber Glass	1% Other	Yellow Fibrous Homogeneous
10094552_0042	insulation				Teased

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William Blackburn (50)

Analyst

Nathaniel J. Durham

Approved Signatory



Bulk Asbestos Analysis

By Polarized Light Microscopy
EPA Method: 600/R-93/116 and
40 CFR, Part 763, Subpart E, App.E



Customer: BCP Environmental
PO Box 871
Braselton, GA 30517

Attn: Brad Pickerel

Lab Order ID: 10094552

Analysis: PLM

Date Received: 10/16/2025

Date Reported: 10/20/2025

Project: UGA-Legions Pool

Sample ID	Description	Asbestos	Fibrous Components	Non-Fibrous Components	Attributes
Lab Sample ID	Lab Notes				Treatment
LP-9 - A	Fiberglass pipe wrap	None Detected	10% Fiber Glass	90% Other	White Non-Fibrous Homogeneous
10094552_0009	wrap				Ashed
LP-9 - B	Fiberglass pipe wrap	None Detected	99% Fiber Glass	1% Other	Yellow Fibrous Homogeneous
10094552_0043	insulation				Teased
LP-10	Acoustical ceiling tile 2'x4'	None Detected	45% Cellulose 45% Fiber Glass	10% Other	Gray Fibrous Heterogeneous
10094552_0010					Teased
LP-11	Acoustical ceiling tile 2'x4'	None Detected	45% Cellulose 45% Fiber Glass	10% Other	Gray Fibrous Heterogeneous
10094552_0011					Teased
LP-12	Acoustical ceiling tile 2'x4'	None Detected	45% Cellulose 45% Fiber Glass	10% Other	Gray Fibrous Heterogeneous
10094552_0012					Teased
LP-13	Sink udnercoating- office	None Detected		100% Other	Gray Non-Fibrous Homogeneous
10094552_0013					Ashed
LP-14	Ext. window frame glazing	None Detected		100% Other	White Non-Fibrous Homogeneous
10094552_0014					Ashed
LP-15	Ext. brick scab caulk	None Detected		100% Other	Brown Non-Fibrous Homogeneous
10094552_0015					Ashed

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William Blackburn (50)

Analyst

Nathaniel J. Durham

Approved Signatory



Bulk Asbestos Analysis

By Polarized Light Microscopy
EPA Method: 600/R-93/116 and
40 CFR, Part 763, Subpart E, App.E



Customer: BCP Environmental
PO Box 871
Braselton, GA 30517

Attn: Brad Pickerel

Lab Order ID: 10094552

Analysis: PLM

Date Received: 10/16/2025

Date Reported: 10/20/2025

Project: UGA-Legions Pool

Sample ID	Description	Asbestos	Fibrous Components	Non-Fibrous Components	Attributes
Lab Sample ID	Lab Notes				Treatment
LP-16	Roof flashing caulk- brick parapet- metal flashing- flat roof	None Detected		100% Other	Gray Non-Fibrous Homogeneous
10094552_0016					Ashed
LP-17	Penetration roof flashing- vent- flat roof	None Detected		100% Other	Black Non-Fibrous Homogeneous
10094552_0017					Ashed
LP-18	Bottom roof felt on concrete- flat roof- main field	2% Chrysotile		98% Other	Black Non-Fibrous Homogeneous
10094552_0018					Ashed
LP-19 - A	Built up roof (BUR) main level- flat TPO roof	5% Chrysotile		95% Other	Black Non-Fibrous Homogeneous
10094552_0019	tar paper				Ashed
LP-19 - B	Built up roof (BUR) main level- flat TPO roof	None Detected	80% Cellulose	20% Other	Brown Fibrous Homogeneous
10094552_0044	insulation				Teased
LP-20 - A	BUR- main field- TPO roof	Not Analyzed			
10094552_0020	tar paper				
LP-20 - B	BUR- main field- TPO roof	None Detected	80% Cellulose	20% Other	Brown Fibrous Homogeneous
10094552_0045	insulation				Teased
LP-21	Penetration roof flashing- gray sealant- metal vent	None Detected	40% Cellulose	60% Other	Gray Non-Fibrous Homogeneous
10094552_0021					Ashed

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William Blackburn (50)

Analyst

Nathaniel J. Durham

Approved Signatory



Bulk Asbestos Analysis

By Polarized Light Microscopy
EPA Method: 600/R-93/116 and
40 CFR, Part 763, Subpart E, App.E



Customer: BCP Environmental
PO Box 871
Braselton, GA 30517

Attn: Brad Pickerel

Lab Order ID: 10094552

Analysis: PLM

Date Received: 10/16/2025

Date Reported: 10/20/2025

Project: UGA-Legions Pool

Sample ID	Description	Asbestos	Fibrous Components	Non-Fibrous Components	Attributes
Lab Sample ID	Lab Notes				Treatment
LP-22 - A	Roof shingles felt- top-womens RR pool house	None Detected	10% Fiber Glass	90% Other	Gray Non-Fibrous Heterogeneous
10094552_0022	shingle				Dissolved
LP-22 - B	Roof shingles felt- top-womens RR pool house	None Detected	40% Cellulose	60% Other	Black Non-Fibrous Homogeneous
10094552_0046	felt				Ashed
LP-23	Bottom roof felt -(old)- women's -RR- bottom layers on ...	None Detected	20% Cellulose	80% Other	Black Fibrous Homogeneous
10094552_0023					Ashed
LP-24	Old roof felt- bottom layer on wood- pavillion	None Detected	70% Cellulose	30% Other	Black Fibrous Homogeneous
10094552_0024					Ashed
LP-25 - A	Top roof shingle & felt- newer- pavillion	None Detected	10% Fiber Glass	90% Other	Gray Non-Fibrous Heterogeneous
10094552_0025	shingle				Dissolved
LP-25 - B	Top roof shingle & felt- newer- pavillion	None Detected	40% Cellulose	60% Other	Black Non-Fibrous Homogeneous
10094552_0047	felt				Ashed
LP-26	Expansion joint caulk- concrete slab around pool	None Detected	10% Cellulose	90% Other	Gray Non-Fibrous Homogeneous
10094552_0026					Ashed
LP-27	Expansion joint caulk- concrete slab around pool	None Detected	10% Cellulose	90% Other	Gray Non-Fibrous Homogeneous
10094552_0027					Ashed

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William Blackburn (50)

Analyst

Nathaniel J. Durham

Approved Signatory



Bulk Asbestos Analysis

By Polarized Light Microscopy
EPA Method: 600/R-93/116 and
40 CFR, Part 763, Subpart E, App.E



Customer: BCP Environmental
PO Box 871
Braselton, GA 30517

Attn: Brad Pickerel

Lab Order ID: 10094552

Analysis: PLM

Date Received: 10/16/2025

Date Reported: 10/20/2025

Project: UGA-Legions Pool

Sample ID	Description	Asbestos	Fibrous Components	Non-Fibrous Components	Attributes
Lab Sample ID	Lab Notes				Treatment
LP-28 - A	Pool plaster liner- floor	None Detected		100% Other	White Non-Fibrous Homogeneous
10094552_0028	finish				Crushed
LP-28 - B	Pool plaster liner- floor	None Detected		100% Other	Tan Non-Fibrous Homogeneous
10094552_0048	base				Crushed
LP-29 - A	Pool plaster liner- floor	None Detected		100% Other	White Non-Fibrous Homogeneous
10094552_0029	finish				Crushed
LP-29 - B	Pool plaster liner- floor	None Detected		100% Other	Tan Non-Fibrous Homogeneous
10094552_0049	base				Crushed
LP-30	Epoxy- gray- anti-slip- RR halls	None Detected		100% Other	Gray Non-Fibrous Homogeneous
10094552_0030					Ashed
LP-31	Ext. window frame caulking- large windows to pump holder	None Detected		100% Other	Gray Non-Fibrous Homogeneous
10094552_0031					Ashed
LP-32 - A	Ceramic tile grout- inside pool- blk tile	None Detected		100% Ceramic	White Non-Fibrous Homogeneous
10094552_0032	ceramic tile				Crushed
LP-32 - B	Ceramic tile grout- inside pool- blk tile	None Detected		100% Other	White Non-Fibrous Homogeneous
10094552_0050	grout				Crushed

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William Blackburn (50)

Analyst

Nathaniel J. Durham

Approved Signatory



Bulk Asbestos Analysis

By Polarized Light Microscopy
EPA Method: 600/R-93/116 and
40 CFR, Part 763, Subpart E, App.E



Customer: BCP Environmental
PO Box 871
Braselton, GA 30517

Attn: Brad Pickerel

Lab Order ID: 10094552

Analysis: PLM

Date Received: 10/16/2025

Date Reported: 10/20/2025

Project: UGA-Legions Pool

Sample ID	Description	Asbestos	Fibrous Components	Non-Fibrous Components	Attributes
Lab Sample ID	Lab Notes				Treatment
LP-33	Pool sealant/caulk- inside pool perimeter- bottom of ... tile	None Detected		100% Other	White Non-Fibrous Homogeneous
10094552_0033					Ashed
LP-34		None Detected		100% Other	Gray Non-Fibrous Homogeneous
10094552_0034					Ashed

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William Blackburn (50)

Analyst

Approved Signatory



Scientific Analytical Institute
302-L Pomona Dr. Greensboro, NC 27407
Phone: 336.292.3888 Fax: 336.292.3313
www.sailab.com lab@sailab.com

Lab Use Only
Lab Order ID: 16094552
Client Code: BCP01

Company Contact Information	
Company: BCP Environmental	Contact: Brad Pickerel
Address: PO Box 871.	Phone ☐ : 770-841-7090
Braselton, GA 30517	Fax ☐ :
	Email ☐ : BCPEHI@aol.com

Billing/Invoice Information	Turn Around Times	
Company:	90 Min. ☐	48 Hours ☒
Contact:	3 Hours ☐	72 Hours ☐
Address:	6 Hours ☐	96 Hours ☐
	12 Hours ☐	120 Hours ☐
	24 Hours ☐	144+ Hours ☐

PO Number:
Project Name/Number: UGA-Legions Pool

Asbestos Test Types	
PLM EPA 600/R-93/116	☒
Positive stop See >	☒
PLM Point Count	☐
PCM NIOSH 7400	☐
TEM AHERA	☐
TEM Level II	☐
TEM NIOSH 7402	☐
TEM Bulk Qualitative	☐
TEM Bulk Chatfield	☐
TEM Bulk Quantitative	☐
TEM Wipe ASTM D6480-99	☐
TEM Microvac ASTM D5755-02	☐
TEM Water EPA 100.2	☐
Other:	☐

Sample ID #	Description/Location	Volume/Area	Comments
LP-1	FLOOR TILE & MASTIC - 12"	> POS. STOP	Office
LP-2	" " "		Storage
LP-3	Gypsum wallboard & JOINT compound - Ceiling		EVBJC Pool House
LP-4	" " " - Pool House		> POS. STOP
LP-5	" " " - Pool House		
LP-6	Cove BASE MASTIC	> POS. STOP	Office
LP-7	" " "		Storage
LP-8	Fiberglass PIPE WRAP	Pool House	Office > POS. STOP
LP-9	" " "		
LP-10	Acoustical Ceiling TILE 2x4'		H/F
LP-11	" " "		PH > POS. STOP
LP-12	" " "	Brown Back	PH
LP-13	SINK Undercoating - office		
LP-14	EXT. Window FRAME GLAZING	Windows to Pump Room	
LP-15	EXT. Brick Slab Caulk	Pool House - base of walls	

Sample by: Brad Pickerel

Relinquished by	Date/Time	Received by	Date/Time
BRP	10/14/25 10:15 AM	yes	10/16/25 10:30 AM

Total # of Samples 23



Lab Use Only
Lab Order ID: _____
Client Code: _____

Page 2 of 2
A-F-019 EXP: 2/4/2021



Analysis for Lead Concentration in Paint Chips

by Flame Atomic Absorption Spectroscopy
EPA SW-846 3050B/6010C/7000B



Customer: BCP Environmental
PO Box 871
Braselton, GA 30517

Attn: Brad Pickerel

Lab Order ID: 10094550

Analysis: PBP

Date Received: 10/16/2025

Date Reported: 10/17/2025

Project: UGA-Legions Pool

Sample ID	Description	Mass (g)	Reporting Limit (ppm)	Concentration (ppm)	Concentration (% by weight)
Lab Sample ID	Lab Notes				
LP-L1	Red pt. structure steel	0.1055	38	<38	<0.0038%
10094550_0001					
LP-L2	Wht. pt. metal door frames	0.0775	52	<52	<0.0052%
10094550_0002					
LP-L3	Blue pt. tanks	0.0602	66	300	0.030%
10094550_0003					
LP-L4	Wht pt. pool liner	0.0580	69	<69	<0.0069%
10094550_0004					
LP-L5	Gray pt. brick wall	0.0565	71	<71	<0.0071%
10094550_0005					
LP-L6	Wht pt. wood column	0.1084	370	48000	4.8%
10094550_0006					
LP-L7	Tan pt. cmu wall (int)	0.0648	62	<62	<0.0062%
10094550_0007					
LP-L8	Tan pt. brickwall	0.0691	58	<58	<0.0058%
10094550_0008					

Disclaimer: Unless otherwise noted blank sample correction was not performed on analytical results. Scientific Analytical Institute participates in the AIHA ELPAT program. ELPAT Laboratory ID: 173190. This report relates only to the samples tested and may not be reproduced, except in full, without the written approval of SAI. Analytical uncertainty available upon request. The quality control samples run with the samples in this report have passed all EPA required specifications unless otherwise noted. RL: (Report Limit for an undiluted 50ml sample is 4µg Total Pb). All sample dried before preparation and analysis.

Mark Doki (14)

Analyst

Nathaniel J. Durham

Approved Signatory



Analysis for Lead Concentration in Paint Chips

by Flame Atomic Absorption Spectroscopy
EPA SW-846 3050B/6010C/7000B



Customer: BCP Environmental
PO Box 871
Braselton, GA 30517

Attn: Brad Pickerel

Lab Order ID: 10094550

Analysis: PBP

Date Received: 10/16/2025

Date Reported: 10/17/2025

Project: UGA-Legions Pool

Sample ID	Description	Mass (g)	Reporting Limit (ppm)	Concentration (ppm)	Concentration (% by weight)
Lab Sample ID	Lab Notes				
LP-L9	Wht pt. wood columns	0.0889	900	110000	11%
10094550_0009					
LP-L10	Wht pt. wood fascia	0.0984	200	21000	2.1%
10094550_0010					
LP-L11	Wht pt. concrete arch block	0.0791	51	150	0.015%
10094550_0011					
LP-L12	Wht pt. wood ceiling & rafters	0.0688	5800	260000	26%
10094550_0012					
LP-L13	Gray pt. cmu walls-perimeter rear wall pool	0.0620	65	<65	<0.0065%
10094550_0013					
LP-L14	Tan pt. brick wall (int)	0.1080	37	1500	0.15%
10094550_0014					

Disclaimer: Unless otherwise noted blank sample correction was not performed on analytical results. Scientific Analytical Institute participates in the AIHA ELPAT program. ELPAT Laboratory ID: 173190. This report relates only to the samples tested and may not be reproduced, except in full, without the written approval of SAI. Analytical uncertainty available upon request. The quality control samples run with the samples in this report have passed all EPA required specifications unless otherwise noted. RL: (Report Limit for an undiluted 50ml sample is 4µg Total Pb). All sample dried before preparation and analysis.

Mark Doki (14)

Analyst

Approved Signatory



Scientific Analytical Institute
302-L Pomona Dr. Greensboro, NC 27407
Phone: 336.292.3888 Fax: 336.292.3313
www.sailab.com lab@sailab.com

Lab use only
Lab Order ID: 1804955
Client Code: BCP 01

Contact Information

Company Name: BCP Environmental

Address: PO Box 871

Braselton, GA 30517

Contact: Brad Pickerel

Phone ☐: (770) 841-7090

Fax ☐:

Email ☐: BCPEHI@aol.com

PO Number:

Project Name/Number: UGA-Legions Pool

Billing/Invoice Information

Company: Same

Address:

Contact:

Phone ☐:

Fax ☐:

Email ☐:

Turn Around Times

3 Hours	☐	72 Hours	☐
6 Hours	☐	96 Hours	☐
12 Hours	☐	120 Hours	☐
24 Hours	☐	144+ Hours	☐
48 Hours	☒		

Lead Test Types

Paint Chips by Flame AA ☒	Soil by Flame AA ☐	Other ☐
Wipe by Flame AA ☐	Air by Flame AA ☐	

Sample ID #	Description/Location	Volume/Area	Comments
LP-L1	RED Pt. Structural Steel	(EXT)	STAGE
LP-L2	Wht. Pt. METAL DOOR FRAMES	(EXT)	office storage
LP-L3	Blue Pt. TANKS	(INT)	Pump/Mech Rm
LP-L4	Wht Pt. Pool LINER	(EXT)	FLOOR
LP-L5	GRAY Pt. BRICK WALL	(EXT)	Brick Pool House
LP-L6	Wht. Pt. Wood Column	(EXT)	Pool House RR Tr
LP-L7	TAN Pt. CMU Wall (INT)	(INT)	Men's RR - Pool Ho
LP-L8	TAN Pt. Brickwall	(INT)	Storage - Pool House
LP-L9	Wht Pt. Wood Columns	(EXT)	PAVILION
LP-L10	Wht. Pt. Wood FASCIA	(EXT)	Pool House - A-tr
LP-L11	Wht. Pt. Concrete Arch Block	(EXT)	PAVILION
LP-L12	Wht Pt Wood Ceiling + RAFTERS	(EXT)	PAVILION
LP-L13	GRAY Pt. CMU walls - perimeter knee wall	(EXT)	Pool - (EXT)
LP-L14	TAN Pt. Brick wall (INT)	(INT)	- Real storage

Sample: Brad Pickerel

Total Number of Samples 14

Relinquished by	Date/Time	Received by	Date/Time
BCP	10/14/25 9:57 AM	yes 10/16 10:30 AM	

Prior HAZARDOUS Building Materials Survey Report (2012)

Hazardous Materials Survey Report



April 12, 2012

The University of Georgia
Legion Pool Facility (Building #2604)
Lumpkin Street
Athens, Georgia

Prepared For:

The University of Georgia
Office of the University Architects for Facilities Planning
382 East Broad Street
Athens, Georgia 30602
Attn: Ms. Lara Mathes

Phone (770) 841-7090

Fax (678) 376-6508

bcpehi@aol.com

BCP ENVIRONMENTAL, LLC

P. O. Box 871, Braselton, Georgia 30517

April 12, 2012

The University of Georgia
Office of University Architects
382 East Broad Street
Athens, Georgia 30602
Attn: Ms. Lara Mathes

Subject: Hazardous Materials Survey Report
The University of Georgia
Legion Pool Facility (Building # 2604)
Lumpkin Street
Athens, Georgia

Dear Ms. Mathes:

BCP Environmental, LLC has completed this report concerning the hazardous materials survey (asbestos, lead-based paint, mercury-containing fluorescent bulbs and PCB-containing light ballasts) for the above referenced site. We understand this survey was requested due to planned demolition of the Legion Pool facility (pool area, enclosed structure and shade pavilion). Category I non-friable asbestos-containing materials (ACMs), lead-based paint (LBP), mercury-containing fluorescent light bulbs were identified at the site. Please see attached report for details.

We appreciate the opportunity to be of service to you on this project. If you have any questions about information in this report, or if I can be of further assistance, please feel free to contact me.

Sincerely,
BCP Environmental, LLC

Brad Pickerel

Brad Pickerel
President

Phone (770) 841-7090

Fax (678) 376-6508

bcpehi@aol.com

BCP Environmental, LLC
P.O. Box 871
Braselton, Georgia 30517

April 12, 2012

The University of Georgia
Office of the University Architects
382 East Broad Street
Athens, Georgia 30602
Attn: Ms. Lara Mathes

Subject: Hazardous Materials Survey Report
The University of Georgia
Legion Pool Facility (Building # 2604)
Lumpkin Street
Athens, Georgia

Introduction:

This report presents the results of the hazardous materials survey for the above referenced site. The Legion Pool facility contains an 11, 000 square foot pool, enclosed 3500 square foot structure (including a basement mechanical room, men's and women's restroom/dressing rooms, storage rooms, offices and concessions) and an approximately 3000 square foot shade pavilion. Construction of the swimming pool and related facilities dates back to 1934. The swimming pool is of standard reinforced-concrete construction that is typical of the era. The associated enclosed bathhouse structure is also of typical concrete-masonry construction. The shade pavilion is wood-framed with asphalt roof shingles.

This inspection was performed by Brad Pickerel, an AHERA (Asbestos Hazard Emergency Response Act) Certified Asbestos Building Inspector and Georgia Certified Lead-based Paint Inspector. BCP Environmental, LLC conducted the site investigation on April 10, 2012.

Purpose:

The purpose of this hazardous materials survey was to identify and locate any asbestos-containing materials (ACM), lead-based painted building components, PCB-containing fluorescent light ballasts and mercury-containing fluorescent light bulbs in regard to planned demolition of the entire facility. The suspect asbestos-containing materials (ACM) were:

- Gypsum Wallboard & Joint Compound in Ceilings
- Suspended Ceiling Tile
- Floor Tile & Mastic
- Window Glazing / Caulking
- Sink Mastic
- Cove Base Adhesive
- Asphalt Roofing Shingles and Felt Paper
- Asphalt Built-Up Gravel Roofing (single-ply roof)
- Pipe Gaskets
- Exterior Concrete Pool Expansion Joint Caulking
- Electrical Wiring Wrap
- Textured Non-Slip Flooring Material

BCP Environmental, LLC
P.O. Box 871
Braselton, Georgia 30517

The suspect lead-based painted (LBP) building components were:

- Interior & Exterior Brick Walls
- Interior & Exterior Concrete Masonry Unit (CMU) Walls
- Exterior Wood Support Columns
- Exterior Metal Doors and Framing
- Exterior Wood Fascias
- Exterior Wood Ceilings (Shade Pavilion)
- Exterior Concrete Pool

This inspection was conducted in general accordance with Environmental Protection Agency (EPA) AHERA guidelines and will satisfy the Georgia Environmental Protection Division (GAEPD) requirements for pre-renovation and pre-demolition inspections. EPA regulation 40 CFR 61, Subpart M, National Emission Standards for Hazardous Air Pollutants (NESHAP), prohibits the release of asbestos fibers to the atmosphere during demolition and renovation activities. The asbestos NESHAP requires that potentially regulated ACM be identified, classified and quantified prior to planned disturbances or renovation activities.

Bulk Sample Survey Protocol:

1. During the inspection, the various building construction materials were categorized into "homogeneous areas" based upon material types, approximate dates of construction, building system/function and appearance.
2. Conducted an interview with Ms. Lara Mathes to elicit information regarding the survey.
3. General site maps were available for review.
4. A brief walk through of the target area to be surveyed allowed conclusions to be made concerning the number of samples needed and the location of the bulk to be collected.
5. A visual inspection was conducted to identify the locations of suspect asbestos containing materials and physically touched the material to determine if it was to be classified as friable (easily crumbled with hand pressure and reduced to powder form) or non-friable. Suspect materials were catalogued according to their intended use. These categories include surfacing materials, thermal system insulation (TSI) and/or miscellaneous.
6. Bulk sampling was conducted in accordance with the procedures outlined in AHERA (40 CFR 763.86 Sampling). These procedures required a random sampling method, which was used to select sampling locations from each homogeneous sampling area. A homogeneous area is defined as an area of surfacing, TSI or miscellaneous material that is uniform in color and texture.
7. The bulk samples were wetted to minimize the release of fibers into the air, sealed within a sample baggie and labeled with an identification number. Bulk sample locations were recorded on field drawings.

Analytical Laboratory Information:

All bulk samples were analyzed by Polarized Light Microscopy (PLM). The Chain-of-Custody form and asbestos bulk analysis results are attached. The bulk samples were analyzed by an independent third-party accredited laboratory. SAI is accredited by the National Institute of Standards and Technology (NIST) National Voluntary Accreditation Program (NVLAP) for laboratories analyzing bulk materials by PLM. Paint chip samples were analyzed by Flame Atomic Absorption Spectroscopy EPA SW-846- 3rd Ed. Method No. 3050B/Method No. 7420.

Phone: 770.841.7090

Fax: 678.376.6508

Email: bcpehi@aol.com

BCP Environmental, LLC
P.O. Box 871
Braselton, Georgia 30517

Confirmed Asbestos-Containing Materials Results:

The following building materials contain 1% or more asbestos and are considered asbestos-containing material (ACM): A total of twenty (20) bulk samples were collected & analyzed by PLM.

Sample ID	Description of Material	Location	NESHAP Classification	Asbestos Type & Concentration	Estimated Quantity
LP-K-01	Black Floor Mastic under Cream Colored 12x12 Inch Floor Tile	Rooms 1 & 2 (former gameroom and snack sales room) – Current concessions and storage room	Category I Non-Friable ACM or Regulated Asbestos-Containing Material (RACM)	5% Chrysotile	700 SF
LP-RCC-07	Gray Expansion Joint Caulking	Concrete Foundation around Pool	Category I Non-Friable ACM	5% Chrysotile	500 LF
LP-BUR-12	Asphalt Built-Up Roofing (BUR) - (Under White PVC Liner)	Two (2) Flat Built-Up Roofs on Enclosed Concessions/Bathhouse Structure	Category I Non-Friable ACM	15% Chrysotile	1800 SF

All other bulk samples tested negative for ACM. See attached floor plan in report for building room locations.

Regulatory Overview & Recommendations:

Friable ACM, Category I and Category II non-friable ACM which is in poor condition and has become friable or which will be subjected to drilling, sanding, grinding, cutting, or abrading and which could be crushed or pulverized during anticipated demolition activities are considered regulated ACM (RACM). RACM must be removed prior to renovation or demolition activities, which will disturb the materials. The owner or operator must provide the Georgia Environmental Protection Division (GA EPD) with written notification at least 10 working days prior to the commencement of demolition activity which will include the disturbance of at least 10 linear feet or 10 square feet of RACM. Removal of RACM must be conducted by a GA EPD licensed asbestos abatement contractor. All ACM must be disposed at a permitted landfill. The Georgia Department of Natural Resources (DNR) provides the GA EPD authority for regulating asbestos containing waste.

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Lead-Based Paint Results:

BCP Environmental, LLC collected fifteen (15) suspect paint chips from the target areas and were tested by an independent certified laboratory. Random paint chip samples were collected from the main enclosed structure and shade pavilion.

The EPA defines lead-based paint as “paint or other surface coatings that contain lead equal to or exceeding 1.0 milligram per square centimeter or **0.5 percent by weight** or 5000 parts per million (ppm) by weight.”

The results of the lead-based paint survey indicate the presence of lead-based paint in the following table:

Sample ID	Component (Substrate)	Color	Concentration (% by Weight)	Location
LP-EWC-5PB	Exterior Paint on Wood Support Columns	White	2.8%	Columns at Entrance to Women’s and Men’s Dressing Rooms / Restrooms
LP-PAV-7P	Exterior Paint on Wood Support Columns	White	6.6%	Columns in Shade Pavilion
LP-PAV-8PB	Exterior Paint on Wood Ceiling	White	17%	Wood Ceiling inside Shade Pavilion
LP-SRPC-11PB	Interior Paint on Brick Wall	White	1.8%	Pool Chemicals Storage Room – Room 15
LP-EF-13PB	Exterior Paint on Wood Fascia Boards	White	5.4%	Enclosed Concessions / Bathhouse Bldg.

All other paint chip samples tested below the Environmental Protection Agency (EPA) definition for lead.

Regulatory Overview & Recommendations (LBP):

Based upon the laboratory results provided, lead based paint was identified in the enclosed and shade pavilion structures. A sample of the waste debris, representative of the waste stream, should be analyzed by TCLP test to determine waste characterization prior to disposal. If the results fall under the regulatory threshold of 5 milligrams per kilogram, this debris may be disposed of in a permitted MSW landfill or a permitted C&D landfill. In the event that the results of the TCLP test exceed the regulatory threshold, the debris from the painted components must be disposed of as hazardous waste.

Any LBP painted metal components that are to be removed entirely during the demolition process may be recycled as scrap metal with no further regulatory requirement.

Where lead is present at any level on concentration, the Federal regulation requires employers to perform assessment exposure monitoring during any demolition that might create lead dust. If no employee is exposed to the action level during this initial assessment, further monitoring can be suspended.

Toxic Polychlorinated Biphenyls (PCBs) Fluorescent Light Ballasts, Mercury-Containing Thermostats & Fluorescent Light Bulbs:

A survey was conducted in the target area for PCB-containing fluorescent light ballasts and mercury-containing fluorescent light bulbs. **Random fluorescent light fixtures were investigated and no PCB-containing ballasts were observed, however mercury-containing fluorescent light bulbs were observed.** All fixtures should be visually inspected for possible PCB-containing ballasts before demolition activities. BCP Environmental recommends the identified hazardous materials be properly removed and disposed of off-site according to all applicable local, state and federal rules and regulations.

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Braselton, Georgia 30517

Estimated No. of PCB - Containing Light Ballasts	No. of Mercury- Containing Fluorescent Bulbs & Size	Location	Mercury - Containing Thermostats
None Observed	72 – 4 Ft. Bulbs 8 – 8 Ft. Bulbs	Throughout Enclosed Structure & Pavilion	None Observed

Limitations & Conclusions:

This survey was conducted with the best information available at the time. The UGA Physical Plant Asbestos “Blue Book” was also reviewed for past abatements and surveys. Hidden ACM may still be present behind structures. Destructive sampling was limited due to the areas being occupied or in current use. All such unidentified materials should be treated as assumed ACM. The assumed ACM should be sampled to confirm the presence of asbestos prior to the demolition activities. Subcontractors and employees working within the target areas at the site should be aware of the locations of the ACM and the possibility of concealed suspect ACM that could be found during demolition activities. We cannot, guarantee that all potential ACM & LBP and other hazardous materials, including quantities, has been located. We do warrant, however, that the investigations and methodology reflect our best efforts based upon the prevailing standard of care in the environmental industry. This report is not intended to serve as a bidding document and should be field verified.

Acknowledgement:

BCP Environmental, LLC appreciates the opportunity to work with you on this project and if you have any questions, please contact me @ (770) 841-7090.

Sincerely,

Brad Pickerel

Brad Pickerel
Project Industrial Hygienist



Bulk Asbestos Analysis

By Polarized Light Microscopy
EPA Method: 600/R-93/116 and 600/M4-82-020



Customer: BCP Environmental
PO Box 871
Braselton, GA 30517

Attn: Brad Pickerel

Lab Order ID: 1206176

Analysis ID: 1206176PLM

Date Received: 4/11/2012

Date Reported: 4/12/2012

Project: UGA-Legions Pool

Sample ID	Description	Asbestos	Fibrous Components	Non-Fibrous Components	Attributes
Lab Sample ID	Lab Notes				Treatment
LP-K-01 - A	12x12 in FTM	None Detected		100% Other	White Non Fibrous Heterogeneous
1206176PLM_1	tile				Dissolved
LP-K-01 - B	12x12 in FTM	5% Chrysotile		95% Other	Yellow, Black Non Fibrous Heterogeneous
1206176PLM_15	mixed mastics				Dissolved
LP-K-02	2x4 ft ceiling tile	None Detected	40% Cellulose 40% Fiber Glass	10% Perlite 10% Other	Tan, White Fibrous Heterogeneous
1206176PLM_2					Crushed
LP-K-03	Sink mastic	None Detected	10% Cellulose	90% Other	Gray Non Fibrous Heterogeneous
1206176PLM_3					Dissolved
LP-K-04	Cove base glue	None Detected	2% Cellulose	98% Other	Yellow Non Fibrous Heterogeneous
1206176PLM_4					Dissolved
LP-WRR-05 - A	Non-slip flooring	None Detected		100% Other	Gray Non Fibrous Heterogeneous
1206176PLM_5	texture				Dissolved
LP-WRR-05 - B	Non-slip flooring	None Detected		100% Other	Tan Non Fibrous Heterogeneous
1206176PLM_16	tan layer				Dissolved
LP-RS-06 - A	Exterior roof shingle & felt	None Detected	15% Fiber Glass	85% Other	Gray, Black Fibrous Heterogeneous
1206176PLM_6	shingle				Dissolved

Disclaimer: Due to the nature of the EPA 600 method, asbestos may not be detected in samples containing low levels of asbestos. We strongly recommended that analysis of floor tiles, vermiculite, and/or heterogeneous soil samples be conducted by TEM for confirmation of "None Detected" by PLM. This report relates only to the samples tested and may not be reproduced, except in full, without the written approval of SAI. This report may not be used by the client to claim product endorsement by NVLAP or any other agency of the U.S. government. Estimated MDL is 0.1%.

Dorlos Ammerman (20)

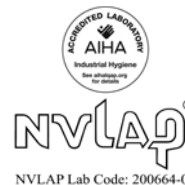
Analyst

Nathaniel Durham, MS or Approved Signatory



Bulk Asbestos Analysis

By Polarized Light Microscopy
EPA Method: 600/R-93/116 and 600/M4-82-020



Customer: BCP Environmental
PO Box 871
Braselton, GA 30517

Attn: Brad Pickerel

Lab Order ID: 1206176

Analysis ID: 1206176PLM

Date Received: 4/11/2012

Project: UGA-Legions Pool

Date Reported: 4/12/2012

Sample ID	Description	Asbestos	Fibrous Components	Non-Fibrous Components	Attributes
Lab Sample ID	Lab Notes				Treatment
LP-RS-06 - B	Exterior roof shingle & felt	None Detected	70% Cellulose	30% Other	Black Fibrous Heterogeneous
1206176PLM_17	felt				Dissolved
LP-RCC-07	Pool exp joint caulk	5% Chrysotile	5% Cellulose	90% Other	Gray Non Fibrous Heterogeneous
1206176PLM_7					Dissolved
LP-EWG-08	Ext window glazing	None Detected		100% Other	Tan Non Fibrous Heterogeneous
1206176PLM_8					Crushed
LP-M-09	Electrical wiring wwrap	None Detected	35% Cellulose	65% Other	Black Fibrous Heterogeneous
1206176PLM_9					Dissolved
LP-M-10	Pipe gasket (red)	None Detected		100% Other	Pink Non Fibrous Heterogeneous
1206176PLM_10					Dissolved
LP-M-11	Pipe gasket (blk)	None Detected		100% Other	Black Non Fibrous Homogeneous
1206176PLM_11					Ashed
LP-BUR-12 - A	Built up roof	15% Chrysotile	15% Cellulose	70% Other	Black Fibrous Heterogeneous
1206176PLM_12	roofing				Dissolved
LP-BUR-12 - B	Built up roof	None Detected	35% Cellulose	65% Other	Brown Fibrous Heterogeneous
1206176PLM_18	insulation				Crushed

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Dorlos Ammerman (20)

Analyst

Nathaniel Durham, MS or Approved Signatory

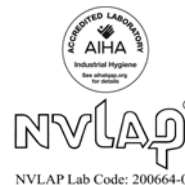
Scientific Analytical Institute, Inc. 302-L Pomona Dr. Greensboro, NC 27407 (336) 292-3888

Page 2 of 3



Bulk Asbestos Analysis

By Polarized Light Microscopy
EPA Method: 600/R-93/116 and 600/M4-82-020



Customer: BCP Environmental
PO Box 871
Braselton, GA 30517

Attn: Brad Pickerel

Lab Order ID: 1206176

Analysis ID: 1206176PLM

Date Received: 4/11/2012

Project: UGA-Legions Pool

Date Reported: 4/12/2012

Sample ID	Description	Asbestos	Fibrous Components	Non-Fibrous Components	Attributes
Lab Sample ID	Lab Notes				Treatment
LP-WBJC-13 - A	WBJC ceiling	None Detected	15% Cellulose	85% Other	Tan Fibrous Heterogeneous
1206176PLM_13	wallboard				Crushed
LP-WBJC-13 - B	WBJC ceiling	None Detected		100% Other	White Non Fibrous Homogeneous
1206176PLM_19	joint comound				Crushed
LP-WBJC-14 - A	WBJC ceiling	None Detected	15% Cellulose	85% Other	Tan Fibrous Heterogeneous
1206176PLM_14	wallboard				Crushed
LP-WBJC-14 - B	WBJC ceiling	None Detected		100% Other	White Non Fibrous Homogeneous
1206176PLM_20	joint comound				Crushed

Disclaimer: Due to the nature of the EPA 600 method, asbestos may not be detected in samples containing low levels of asbestos. We strongly recommended that analysis of floor tiles, vermiculite, and/or heterogeneous soil samples be conducted by TEM for confirmation of "None Detected" by PLM. This report relates only to the samples tested and may not be reproduced, except in full, without the written approval of SAI. This report may not be used by the client to claim product endorsement by NVLAP or any other agency of the U.S. government. Estimated MDL is 0.1%.

Dorlos Ammerman (20)

Analyst

Nathaniel Durham, MS or Approved Signatory



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302-L Pomona Dr. Greensboro, NC 27407
Phone: 336.292.3888 Fax: 336.292.3313
www.sailab.com lab@sailab.com

Lab Use Only
Lab Order ID: 12060176
Client Code: BCP01

Company Contact Information	
Company: BCP Environmental	Contact: Brad Pickrel
Address: PO Box 871	Phone ☐ : 770-841-7090
Braselton, GA 30517	Fax ☐ :
	Email ☐ : BCPEHI@aol.com

Asbestos Test Types	
PLM EPA 600/R-93/116	☒
Positive stop	☐
PLM Point Count	☐
PCM NIOSH 7400	☐
TEM AHERA	☐
TEM Level II	☐
TEM NIOSH 7402	☐
TEM Bulk Qualitative	☐
TEM Bulk Chatfield	☐
TEM Bulk Quantitative	☐
TEM Wipe ASTM D6480-99	☐
TEM Microvac ASTM D5755-02	☐
TEM Water EPA 100.2	☐
Other:	☐

Billing/Invoice Information	Turn Around Times
Company:	90 Min. ☐ 48 Hours ☐
Contact:	3 Hours ☐ 72 Hours ☐
Address:	6 Hours ☐ 96 Hours ☐
	12 Hours ☐ 120 Hours ☐
	24 Hours ☒ 144* Hours ☐

PO Number:

Project Name/Number: UGA-Legions Pool

Sample ID #	Description/Location	Volume/Area	Comments
LP-K-01	12x12 in. FTM		Kitchen
LP-K-02	2x4 ft Ceiling TILE		Kitchen
LP-K-03	SINK MASTIC		Kitchen
LP-K-04	Cove Base Glue		
LP-WRR-05	Non-Slip Flooring	Grayish	Women's RR
LP-RS-06	EXTERIOR ROOF Shingle & Felt		
LP-RCC-07	Pool EXP. JOINT Caulk	Concrete Perimeter Area of Pool	
LP-EWG-08	EXT. WINDOW GLAZING	Window Facing Pool by RR	
LP-M-09	Electrical Wiring wrap	Black - Mech Room	
LP-M-10	Pipe Gasket (Red)	Mech Rm > pool Equip.	
LP-M-11	Pipe Gasket (Blk)	Mech Room	
LP-BUP-12	Built-up Roof		
LP-WBTC-13	WBTC Ceiling		
LP-WBTC-14	WBTC Ceiling		Custodial/Office #2

Relinquished by	Date/Time	Received by	Date/Time
	4-10-12		4-11-12

Total # of Samples 14



Analysis for Lead Concentration in Paint Chips

by Flame Atomic Absorption Spectroscopy
EPA SW-846 3rd Ed. Method No. 3050B/Method No. 7420



Customer: BCP Environmental
PO Box 871
Braselton GA 30517

Attn: Brad Pickerel

Lab Order ID: 1206171

Analysis ID: 1206171_PBP

Date Received: 4/11/2012

Date Reported: 4/11/2012

Project: UGA-Legions Pool

Sample ID	Description	Mass	Analytical Sensitivity	Concentration
Lab Sample ID	Lab Notes	(g)	(% by weight)	(% by weight)
LP-K-1PB	Cream Pt brick wall	0.0713	0.002%	0.006%
1206171PBP_1				
LP-K-2PB	Cream Pt CMU wall	0.0368	0.004%	<0.011%
1206171PBP_2				
LP-SR-3PB	Cream Pt brick wall	0.0535	0.003%	0.008%
1206171PBP_3				
LP-K-4PB	Ext gray Pt brick wall	0.0789	0.002%	0.10%
1206171PBP_4				
LP-EWC-5PB	Ext wht Pt wall column	0.0571	0.024%	2.8%
1206171PBP_5				
LP-SR-6PB	Ext wht Pt metal door frame	0.0466	0.003%	0.025%
1206171PBP_6				
LP-PAV-7PB	Ext wht Pt metal wood column	0.0426	0.032%	6.6%
1206171PBP_7				
LP-PAV-8PB	Ext wht Pt wood ceiling	0.0740	0.18%	17%
1206171PBP_8				
LP-PW-9PB	Ext CMU wall gray PT	0.0398	0.003%	0.022%
1206171PBP_9				
LP-WRR-10PB	Cream PT brick wall	0.0426	0.003%	<0.009%
1206171PBP_10				

Scientific Analytical Institute successfully participates in the AIHA ELPAT for Lead program. ELPAT Laboratory ID: 173190 (R.L. = 0.01 wt.%)
The quality control samples run with the samples in this report have passed all AIHA required specifications unless otherwise noted.

Robert Duke (15)

Analyst

Scientific Analytical Institute, Inc. 302-L Pomona Dr. Greensboro, NC 27407 (336) 292-3888

Approved Signatory



Analysis for Lead Concentration in Paint Chips

by Flame Atomic Absorption Spectroscopy
EPA SW-846 3rd Ed. Method No. 3050B/Method No. 7420



Customer: BCP Environmental
PO Box 871
Braselton GA 30517

Attn: Brad Pickerel

Lab Order ID: 1206171

Analysis ID: 1206171_PBP

Date Received: 4/11/2012

Date Reported: 4/11/2012

Project: UGA-Legions Pool

Sample ID	Description	Mass (g)	Analytical Sensitivity (% by weight)	Concentration (% by weight)
Lab Sample ID	Lab Notes			
LP-SRPC-11PB	Wht PT brick wall	0.0421	0.003%	1.8%
1206171PBP_11				
LP-EBW-12PB	Ext gray PT Brick wall	0.0535	0.003%	<0.007%
1206171PBP_12				
LP-EF-13PB	Ext wht Pt fascia wood	0.0306	0.044%	5.4%
1206171PBP_13				
LP-MRR-14PB	Cream PT brick wall	0.0510	0.003%	<0.008%
1206171PBP_14				
LP-PB-15PB	Wht PT concrete pool bottom	0.0426	0.003%	<0.009%
1206171PBP_15				

Scientific Analytical Institute successfully participates in the AIHA ELPAT for Lead program. ELPAT Laboratory ID: 173190 (R.L. = 0.01 wt.%)
The quality control samples run with the samples in this report have passed all AIHA required specifications unless otherwise noted.

Robert Duke (15)

Analyst

Scientific Analytical Institute, Inc. 302-L Pomona Dr. Greensboro, NC 27407 (336) 292-3888

Approved Signatory



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Phone: 336.292.3888 Fax: 336.292.3313
www.sailab.com lab@sailab.com

Lab use only
Lab Order ID: 12060171
Client Code: BCP 01

Contact Information
Company Name: BCP Environmental
Address: PO Box 871 Braselton, GA 30517
Contact: Brad Pickrel
Phone ☐ : (770) 841-7090
Fax ☐ :
Email ☐ : BCPEHI@aol.com
PO Number:
Project Name/Number: UGA-Legions Pool

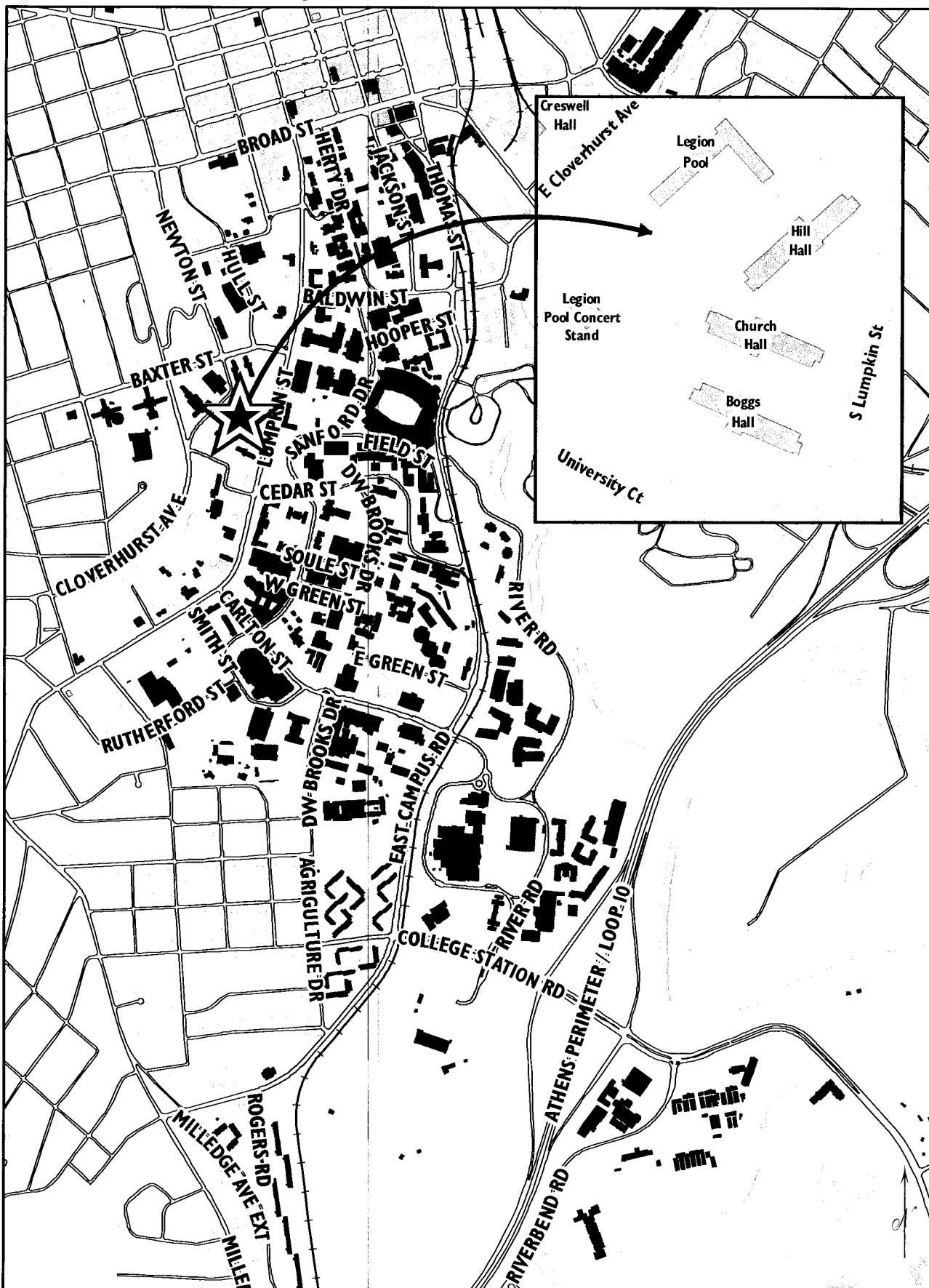
Billing/Invoice Information
Company: Same
Address:
Contact:
Phone ☐ :
Fax ☐ :
Email ☐ :

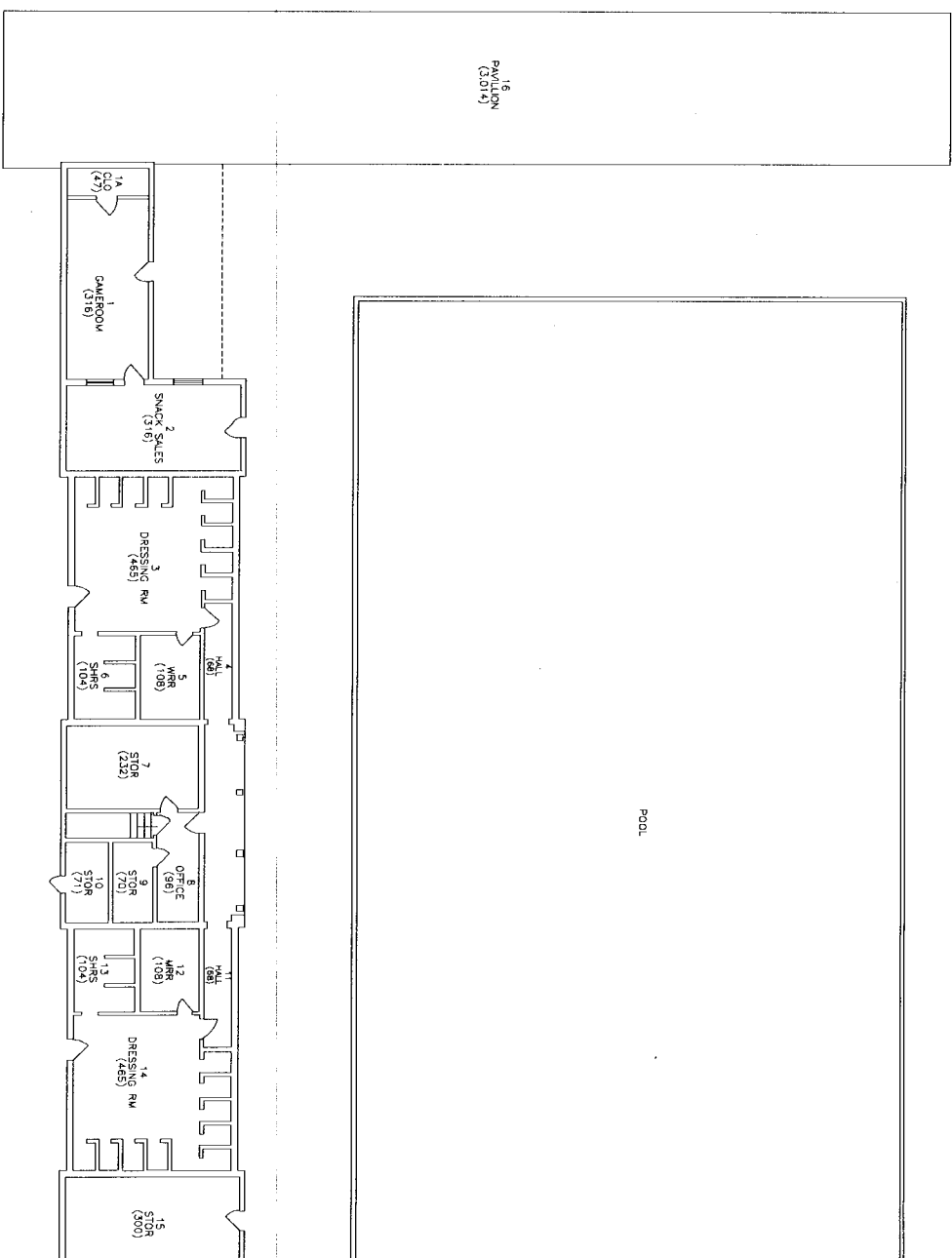
Lead Test Types
Paint Chips by Flame AA ☒ Soil by Flame AA ☐ Other ☐
Wipe by Flame AA ☐ Air by Flame AA ☐

Turn Around Times	
3 Hours ☐	72 Hours ☐
6 Hours ☐	96 Hours ☐
12 Hours ☐	120 Hours ☐
24 Hours ☒	144+ Hours ☐
48 Hours ☐	

Sample ID #	Description/Location	Volume/Area	Comments
LP-K-1PB	Cream PT Brick wall	Interior	Kitchen
LP-K-2PB	Cream PT CMU Wall	"	"
LP-SR-3PB	Cream PT Brick wall	"	"
LP-K-4PB	EXT. Gray PT Brick wall	EXT. Front by office	
LP-EWC-5PB	EXT. wht PT wood column	EXT. RR AREA	
LP-SR-6PB	EXT. wht PT Metal door frame	EXT. Storage w/ Lattas ^{pool}	
LP-PAV-7PB	EXT. wht PT Wood Column	Pavillion	
LP-PAV-8PB	EXT. wht PT Wood Ceiling	" "	
LP-PW-9PB	EXT. CMU Wall Gray PT	Wall around Pool	
LP-WR-10PB	Cream PT Brick wall	Interior	
LP-SRPC-11PB	Wht PT Brick wall	INT. END STORAGE ROOM	
LP-EBW-12PB	EXT. Gray PT Brick wall	EXT. END OF Bldg - Storage rm	
LP-EF-13PB	EXT. wht PT Facia wood		
LP-MR-14PB	Cream PT Brick wall	Foyer Entry to MRL	
LP-PB-15PB	Wht PT Concrete Pool Bottom	EXT.	

Relinquished by	Date/Time 4-10-12	Received by	Date/Time 4-11-12
Total Number of Samples 15		Page 1 of 1	





LEGEND

100	ROOM NUMBER
OFFICE	ROOM USE
(123)	SQUARE FOOTAGE

0 2 4 6 8 10 12 14 16 18 20
GRAPHIC SCALE - FEET



FACILITIES INVENTORY SECTION					
ROOM NO.	DESCRIPTION	FY	DATE	TITLE	SHEET
				LEGION POOL	1
				SERVICE	
				BRANCH #600	
				DIVISION	
				DEPT.	
				DATE	
				BY	



The University of Georgia
Engineering Department
Physical Plant

Photographs



1. ACM black mastic under 12x12 inch floor tile in Room 1 Concessions (former gameroom).



2. ACM black mastic under 12x12 inch floor tile in Storage Room 2 (former snack sales).



3. ACM built-up asphalt roof atop enclosed concessions/bathhouse structure.



4. LBP in exterior white support columns in main structure.



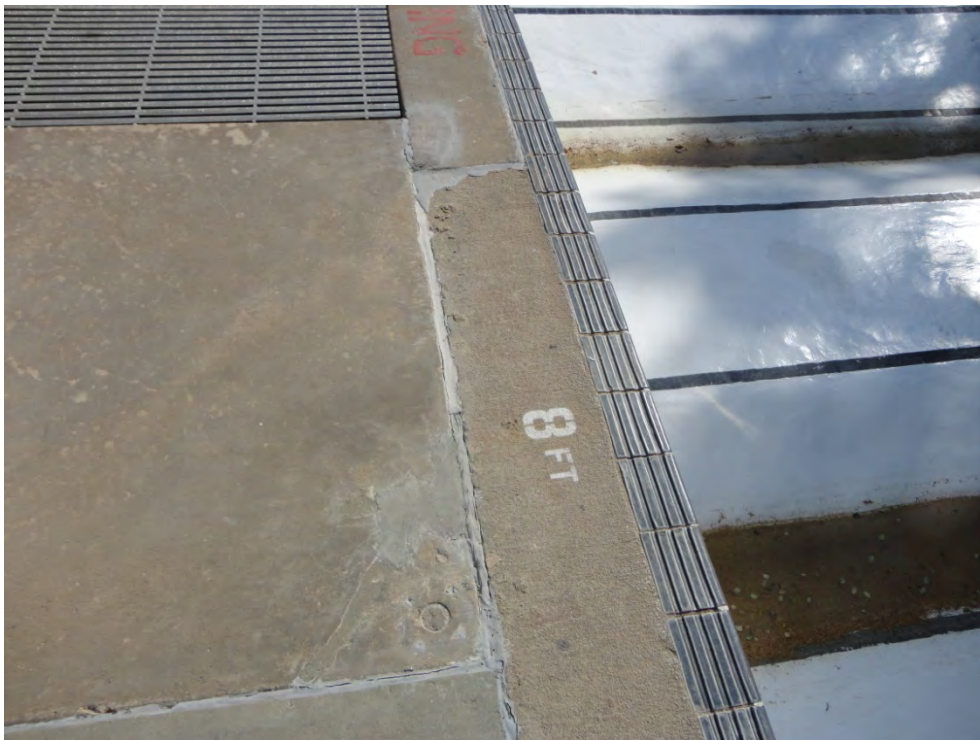
5. LBP in interior white brick walls in Storage Room 15.



6. LBP in white support columns and ceiling in shade pavilion.



7. LBP in exterior white fascia board in main enclosed structure.



8. ACM concrete expansion joint caulk around pool foundation.



9. Typical mercury-containing fluorescent light bulbs in enclosed bathhouse structure.



10. Typical mercury-containing fluorescent light bulbs in Concession room.

CWD International, Inc. dba

Environmental Training Fund

39172.5473CERT/PBIRE

900 N.W. 5TH Avenue, Fort Lauderdale, Florida 33311

(954) 624-7208 Processed By:

This is to Certify that
Brad C. Pickerel



X X X - X X - 7 2 4 1

2119 Shay CT, Buford, GA 30519

has successfully completed an English

Lead 8 Hr. Building Inspector Refresher

1-Apr-11 TO 1-Apr-11

Initial courses include an extensive hands-on component.

Complies with Sec. 402 TSCA 15 USC 2682 and Accredited by the IL-DPH, CT-DPH, MO-DOH, PA-DLI, DE-DPH, and VA-DPH.

Trainer(s): Jim Stump

Training Address: 5891 New Peachtree RD Suite 122, Atlanta, GA, 30340

Assessed the hands-on assessment & completed the course exam on: **1-Apr-11**

This Certificate Expires:

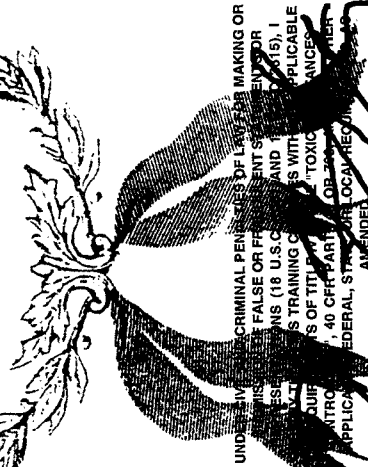
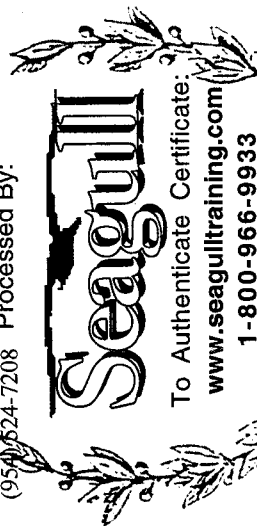
OSHA DATE: 31-Mar-12

SUNSET DATE: 31-Mar-14

31-Mar-14

GA-PreAudit

USEPA's actual expiration date will appear on individual's license. See individual state rules for actual state expiration date.



James F. Stump, Training Manager

Certificate Number..... 1 4 8 0 5 3

Course Number GE1113

Asbestos Consulting & Training Systems

39462.6925CERT/BIR

900 N.W. 5TH Avenue, Fort Lauderdale, Florida 33311

(954) 224-7208 Processed By:

This is to Certify that
Bradley C. Pickerel



X X X - X X - 6 5 3 4

1830 Jerry Way #A18, Norcross, GA 30093

has successfully completed an English

Asbestos Building Inspection Refresher

16-Jan-12 TO 16-Jan-12

Individual above has completed the requisite training for accreditation under TSCA Title II

Meets state requirements of FL49-0001020/CN-0006273.

Trainer(s): Alberto A. Ania

Training Address: 5891 New Peachtree RD Suite 122, Atlanta, GA, 30340

Successful course completion based on exam score.

16-Jan-12

James F. Stump, Course Sponsor

This Certificate Expires:

OSHA DATE: 15-Jan-13

15-Jan-13

USEPA's actual expiration date will appear on individual's license. See individual state rules for actual state expiration date.



To Authenticate Certificate:

www.seagulltraining.com

1-800-966-9933

UNDER FEDERAL LAW, IT IS A VIOLATION OF THE FEDERAL ASBESTOS TRAINING ACT (FATA) TO REPRODUCE OR TRANSMIT THIS CERTIFICATE IN ANY MANNER WITHOUT THE WRITTEN PERMISSION OF SEAGULL TRAINING SYSTEMS, INC. (18 U.S.C. 1030). ANY VIOLATION OF THIS ACT IS A FEDERAL OFFENSE AND IS PUNISHABLE BY A FINE OF UP TO \$10,000 AND/OR IMPRISONMENT FOR UP TO 5 YEARS, OR BOTH. SEAGULL TRAINING SYSTEMS, INC. IS NOT RESPONSIBLE FOR ANY VIOLATIONS OF FATA.

Certificate Number..... 151876

Course Number GE1203

Certifications

Asbestos Consulting & Training Systems

2835 N.W. 12TH Avenue, Fort Lauderdale, Florida 33311

This is to Certify that

Bradley C Pickerel



X X X - X X - 7 2 4 1

PO BOX 871, Braselton, GA 30517

has successfully completed an English

Asbestos Building Inspection Refresher

9-May-25

TO

9-May-25

and has completed the requisite training for TSCA

Meets state requirements of FL49-0001020/CN-0006273

NDAAC Provider #451

Trainer(s): Dennis R. Leon

Training Address: 5891 New Peachtree Rd., Atlanta, GA 30340

Successful course completion based on exam score on: 05/09/25

This Certificate Expires:



9-May-26

0 5 / 0 9 / 2 6

Processed By:

Seagull

To Authenticate Certificate
www.seagulltraining.com
1-800-966-9933

INTEGRITY AND CREDIBILITY ARE THE FOUNDATIONS OF A SUCCESSFUL BUSINESS. SEAGULL TRAINING SYSTEMS IS A COMMITMENT TO EXCELLENCE IN THE ASBESTOS TRAINING INDUSTRY. WE ARE THE ONLY TRAINING PROVIDER IN THE UNITED STATES TO BE CERTIFIED BY THE NATIONAL ASBESTOS TRAINING BOARD (NATB) AND THE NATIONAL ASBESTOS TRAINING BOARD (NATB) IS THE ONLY TRAINING PROVIDER IN THE UNITED STATES TO BE CERTIFIED BY THE NATIONAL ASBESTOS TRAINING BOARD (NATB).

James F. Stump, Course Sponsor

Certificate Number:



1 9 8 8 9 3

Course Number: GE2519

X429268PBIRE

Environmental Training Fund

2835 N.W. 12TH Avenue, Fort Lauderdale, Florida 33311

Processed By:

This is to Certify that

Bradley C Pickereel



X X X - X X - 7 2 4 1

PO BOX 871, Braselton, GA 30517

has successfully completed an English

Lead 8 Hr. Building Inspector Refresher

28-Mar-25 TO 28-Mar-25

This certificate is directly approved by GA AND AL among others.

This EPA-authorized state certificate may be used to obtain EPA re-certification.

Trainer(s): Dennis R. Leon

Training Address: 5891 New Peachtree Rd., Atlanta, GA 30340

James F. Stump, Training Manager

Certificate Number:



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Certificate Number:



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Certificate Number:



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Certificate

ATTACHMENT K

Legion Pool Utility Use Report FY23-25

UGA Utility Use Report

Account: 2605E01 Electric Mtr Number: 62-028-390 9597GN592725 100.00%
 Building Num: 2604 802 S. Lumpkin St. Legion Pool 0.00%
 0.00%

WorkRequest: 2605

Service Period			Usage / Usage per Day		Cost / Cost per Day	
6/7/2022	7/12/2022	35 Days	26,400 kWH	754 kWH	\$2,244.00	\$64.11
7/12/2022	8/9/2022	28 Days	21,280 kWH	760 kWH	\$1,809.00	\$64.61
8/9/2022	9/13/2022	35 Days	7,440 kWH	213 kWH	\$632.00	\$18.06
9/13/2022	10/11/2022	28 Days	3,600 kWH	129 kWH	\$306.00	\$10.93
10/11/2022	11/8/2022	28 Days	3,120 kWH	111 kWH	\$265.00	\$9.46
11/8/2022	12/13/2022	35 Days	2,560 kWH	73 kWH	\$218.00	\$6.23
12/13/2022	1/10/2023	28 Days	1,760 kWH	63 kWH	\$150.00	\$5.36
1/10/2023	2/14/2023	35 Days	1,760 kWH	50 kWH	\$150.00	\$4.29
2/14/2023	3/14/2023	28 Days	2,800 kWH	100 kWH	\$238.00	\$8.50
3/14/2023	4/11/2023	28 Days	2,240 kWH	80 kWH	\$190.00	\$6.79
4/11/2023	5/9/2023	28 Days	9,200 kWH	329 kWH	\$782.00	\$27.93
5/9/2023	6/9/2023	31 Days	21,440 kWH	692 kWH	\$1,822.00	\$58.77
Total for	2023	367 Days	103,600 kWH	282 kWH per day	\$8,806	
6/9/2023	7/11/2023	32 Days	23,600 kWH	738 kWH	\$2,832.00	\$88.50
7/11/2023	8/8/2023	28 Days	21,520 kWH	769 kWH	\$2,582.00	\$92.21
8/8/2023	9/12/2023	35 Days	16,000 kWH	457 kWH	\$1,920.00	\$54.86
9/12/2023	10/10/2023	28 Days	4,640 kWH	166 kWH	\$557.00	\$19.89
10/10/2023	11/7/2023	28 Days	3,440 kWH	123 kWH	\$413.00	\$14.75
11/7/2023	12/12/2023	35 Days	2,880 kWH	82 kWH	\$346.00	\$9.89
12/12/2023	1/9/2024	28 Days	1,440 kWH	51 kWH	\$173.00	\$6.18
1/9/2024	2/13/2024	35 Days	2,080 kWH	59 kWH	\$250.00	\$7.14
2/13/2024	3/12/2024	28 Days	960 kWH	34 kWH	\$115.00	\$4.11
3/12/2024	4/8/2024	27 Days	880 kWH	33 kWH	\$106.00	\$3.93
4/8/2024	5/14/2024	36 Days	10,320 kWH	287 kWH	\$1,238.00	\$34.39
5/14/2024	6/11/2024	28 Days	19,200 kWH	686 kWH	\$2,304.00	\$82.29
Total for	2024	368 Days	106,960 kWH	291 kWH per day	\$12,836	
6/11/2024	7/9/2024	28 Days	20,320 kWH	726 kWH	\$2,032.00	\$72.57
7/9/2024	8/13/2024	35 Days	23,120 kWH	661 kWH	\$2,312.00	\$66.06
8/13/2024	8/29/2024	16 Days	2,160 kWH	135 kWH	\$216.00	\$13.50
8/29/2024	10/15/2024	47 Days	5,520 kWH	117 kWH	\$552.00	\$11.74
11/12/2024	12/10/2024	28 Days	2,400 kWH	86 kWH	\$240.00	\$8.57
12/10/2024	1/7/2025	28 Days	1,920 kWH	69 kWH	\$192.00	\$6.86
1/7/2025	2/11/2025	35 Days	2,240 kWH	64 kWH	\$224.00	\$6.40
2/11/2025	3/11/2025	28 Days	1,040 kWH	37 kWH	\$104.00	\$3.71
3/11/2025	4/8/2025	28 Days	960 kWH	34 kWH	\$96.00	\$3.43
4/8/2025	5/13/2025	35 Days	8,400 kWH	240 kWH	\$840.00	\$24.00
5/13/2025	6/10/2025	28 Days	19,280 kWH	689 kWH	\$1,928.00	\$68.86
Total for	2025	336 Days	87,360 kWH	260 kWH per day	\$8,736	
6/10/2025	7/15/2025	35 Days	24,960 kWH	713 kWH	\$2,746.00	\$78.46
7/15/2025	8/12/2025	28 Days	17,600 kWH	629 kWH	\$1,936.00	\$69.14
Total for	2026	63 Days	42,560 kWH	676 kWH per day	\$4,682	

UGA Utility Use Report

Account: 27163-117735 Sewer Mtr Number: 030009791 9597GN592725 100.00%
 Building Num: 2604 Legion Pool 0.00%
 0.00%

WorkRequest: 2605

Service Period			Usage / Usage per Day		Cost / Cost per Day	
5/9/2022	6/8/2022	30 Days	0 Gallons	0 Gallons	\$345.00	\$11.50
6/8/2022	7/8/2022	30 Days	0 Gallons	0 Gallons	\$429.00	\$14.30
7/8/2022	8/8/2022	31 Days	0 Gallons	0 Gallons	\$414.00	\$13.35
8/8/2022	9/3/2022	26 Days	0 Gallons	0 Gallons	\$104.00	\$4.00
9/3/2022	10/11/2022	38 Days	0 Gallons	0 Gallons	\$63.00	\$1.66
10/11/2022	11/9/2022	29 Days	0 Gallons	0 Gallons	\$63.00	\$2.17
11/9/2022	12/9/2022	30 Days	0 Gallons	0 Gallons	\$63.00	\$2.10
12/9/2022	1/9/2023	31 Days	0 Gallons	0 Gallons	\$62.00	\$2.00
1/9/2023	2/10/2023	32 Days	0 Gallons	0 Gallons	\$65.00	\$2.03
2/10/2023	3/13/2023	31 Days	0 Gallons	0 Gallons	\$63.00	\$2.03
3/13/2023	4/12/2023	30 Days	0 Gallons	0 Gallons	\$63.00	\$2.10
4/12/2023	5/12/2023	30 Days	0 Gallons	0 Gallons	\$375.00	\$12.50
Total for	2023	368 Days	0 Gallons	0 Gallons per day	\$2,109	
5/12/2023	6/12/2023	31 Days	0 Gallons	0 Gallons	\$349.00	\$11.26
6/12/2023	7/12/2023	30 Days	0 Gallons	0 Gallons	\$377.00	\$12.57
7/12/2023	8/11/2023	30 Days	0 Gallons	0 Gallons	\$373.00	\$12.43
8/11/2023	9/11/2023	31 Days	0 Gallons	0 Gallons	\$134.00	\$4.32
9/11/2023	10/12/2023	31 Days	0 Gallons	0 Gallons	\$65.00	\$2.10
10/12/2023	11/13/2023	32 Days	0 Gallons	0 Gallons	\$65.00	\$2.03
11/13/2023	12/12/2023	29 Days	0 Gallons	0 Gallons	\$64.00	\$2.21
12/12/2023	1/10/2024	29 Days	0 Gallons	0 Gallons	\$63.00	\$2.17
1/10/2024	2/9/2024	30 Days	0 Gallons	0 Gallons	\$63.00	\$2.10
2/9/2024	3/11/2024	31 Days	0 Gallons	0 Gallons	\$64.00	\$2.06
3/11/2024	4/10/2024	30 Days	0 Gallons	0 Gallons	\$65.00	\$2.17
4/10/2024	5/10/2024	30 Days	0 Gallons	0 Gallons	\$340.00	\$11.33
Total for	2024	364 Days	0 Gallons	0 Gallons per day	\$2,022	
5/10/2024	6/10/2024	31 Days	0 Gallons	0 Gallons	\$388.00	\$12.52
6/10/2024	7/10/2024	30 Days	0 Gallons	0 Gallons	\$437.00	\$14.57
7/10/2024	8/9/2024	30 Days	0 Gallons	0 Gallons	\$443.00	\$14.77
8/9/2024	9/11/2024	33 Days	0 Gallons	0 Gallons	\$77.00	\$2.33
9/11/2024	10/10/2024	29 Days	0 Gallons	0 Gallons	\$65.00	\$2.24
10/10/2024	11/8/2024	29 Days	0 Gallons	0 Gallons	\$65.00	\$2.24
11/8/2024	12/12/2024	34 Days	0 Gallons	0 Gallons	\$65.00	\$1.91
12/12/2024	1/13/2025	32 Days	0 Gallons	0 Gallons	\$63.00	\$1.97
1/13/2025	2/12/2025	30 Days	0 Gallons	0 Gallons	\$64.00	\$2.13
2/12/2025	3/14/2025	30 Days	0 Gallons	0 Gallons	\$65.00	\$2.17
3/14/2025	4/11/2025	28 Days	0 Gallons	0 Gallons	\$73.00	\$2.61
4/11/2025	5/12/2025	31 Days	0 Gallons	0 Gallons	\$379.00	\$12.23
Total for	2025	367 Days	0 Gallons	0 Gallons per day	\$2,184	
5/12/2025	6/24/2025	43 Days	0 Gallons	0 Gallons	\$389.00	\$9.05
6/24/2025	7/16/2025	22 Days	0 Gallons	0 Gallons	\$424.00	\$19.27
Total for	2026	65 Days	0 Gallons	0 Gallons per day	\$813	

UGA Utility Use Report

Account: 27163-117735 Water Mtr Number: 030009791 9597GN592725 100.00%
 Building Num: 2604 Legion Pool 0.00%
 0.00%

WorkRequest: 2605

Service Period				Usage / Usage per Day		Cost /	Cost per Day
5/9/2022	6/8/2022	30	Days	853,353 Gallons	28,445 Gallons	\$4,890.00	\$163.00
6/8/2022	7/8/2022	30	Days	925,654 Gallons	30,855 Gallons	\$5,786.00	\$192.87
7/8/2022	8/8/2022	31	Days	888,911 Gallons	28,675 Gallons	\$5,556.00	\$179.23
8/8/2022	9/3/2022	26	Days	104,390 Gallons	4,015 Gallons	\$638.00	\$24.54
9/3/2022	10/11/2022	38	Days	1,461 Gallons	38 Gallons	\$9.00	\$0.24
10/11/2022	11/9/2022	29	Days	1,582 Gallons	55 Gallons	\$10.00	\$0.34
11/9/2022	12/9/2022	30	Days	54 Gallons	2 Gallons	\$0.00	\$0.00
12/9/2022	1/9/2023	31	Days	0 Gallons	0 Gallons	\$0.00	\$0.00
1/9/2023	2/10/2023	32	Days	6,435 Gallons	201 Gallons	\$40.00	\$1.25
2/10/2023	3/13/2023	31	Days	129 Gallons	4 Gallons	\$1.00	\$0.03
3/13/2023	4/12/2023	30	Days	806 Gallons	27 Gallons	\$5.00	\$0.17
4/12/2023	5/12/2023	30	Days	789,358 Gallons	26,312 Gallons	\$4,934.00	\$164.47
Total for	2023	368	Days	3,572,133 Gallons	9,707 Gallons per day	\$21,869	
5/12/2023	6/12/2023	31	Days	724,647 Gallons	23,376 Gallons	\$4,529.00	\$146.10
6/12/2023	7/12/2023	30	Days	771,462 Gallons	25,715 Gallons	\$4,968.00	\$165.60
7/12/2023	8/11/2023	30	Days	762,576 Gallons	25,419 Gallons	\$4,911.00	\$163.70
8/11/2023	9/11/2023	31	Days	176,007 Gallons	5,678 Gallons	\$1,077.00	\$34.74
9/11/2023	10/12/2023	31	Days	5,119 Gallons	165 Gallons	\$33.00	\$1.06
10/12/2023	11/13/2023	32	Days	5,232 Gallons	164 Gallons	\$34.00	\$1.06
11/13/2023	12/12/2023	29	Days	2,077 Gallons	72 Gallons	\$13.00	\$0.45
12/12/2023	1/10/2024	29	Days	317 Gallons	11 Gallons	\$2.00	\$0.07
1/10/2024	2/9/2024	30	Days	1,624 Gallons	54 Gallons	\$10.00	\$0.33
2/9/2024	3/11/2024	31	Days	1,755 Gallons	57 Gallons	\$11.00	\$0.35
3/11/2024	4/10/2024	30	Days	5,864 Gallons	195 Gallons	\$38.00	\$1.27
4/10/2024	5/10/2024	30	Days	680,224 Gallons	22,674 Gallons	\$4,380.00	\$146.00
Total for	2024	364	Days	3,136,904 Gallons	8,618 Gallons per day	\$20,006	
5/10/2024	6/10/2024	31	Days	798,279 Gallons	25,751 Gallons	\$5,257.00	\$169.58
6/10/2024	7/10/2024	30	Days	893,648 Gallons	29,788 Gallons	\$5,961.00	\$198.70
7/10/2024	8/9/2024	30	Days	907,476 Gallons	30,249 Gallons	\$6,017.00	\$200.57
8/9/2024	9/11/2024	33	Days	34,982 Gallons	1,060 Gallons	\$237.00	\$7.18
9/11/2024	10/10/2024	29	Days	5,672 Gallons	196 Gallons	\$30.00	\$1.03
10/10/2024	11/8/2024	29	Days	4,278 Gallons	148 Gallons	\$28.00	\$0.97
11/8/2024	12/12/2024	34	Days	5,150 Gallons	151 Gallons	\$34.00	\$1.00
12/12/2024	1/13/2025	32	Days	915 Gallons	29 Gallons	\$6.00	\$0.19
1/13/2025	2/12/2025	30	Days	2,436 Gallons	81 Gallons	\$17.00	\$0.57
2/12/2025	3/14/2025	30	Days	6,057 Gallons	202 Gallons	\$40.00	\$1.33
3/14/2025	4/11/2025	28	Days	25,060 Gallons	895 Gallons	\$166.00	\$5.93
4/11/2025	5/12/2025	31	Days	755,849 Gallons	24,382 Gallons	\$5,012.00	\$161.68
Total for	2025	367	Days	3,439,802 Gallons	9,373 Gallons per day	\$22,805	
5/12/2025	6/24/2025	43	Days	778,847 Gallons	18,113 Gallons	\$5,164.00	\$120.09
6/24/2025	7/16/2025	22	Days	861,849 Gallons	39,175 Gallons	\$5,878.00	\$267.18
Total for	2026	65	Days	1,640,696 Gallons	25,241 Gallons per day	\$11,042	

ATTACHMENT L

GEPA adverse impacts determination



**UNIVERSITY OF
GEORGIA**

**ENVIRONMENTAL SAFETY DIVISION
GEPA EVALUATION**

Project No.	OUA-26-028
Project Name:	Legion Pool Complex Redevelopment
Institution:	University of Georgia
Date of Assessment:	October 30, 2025

Brief Project Description:

The University of Georgia proposes to redevelop the Legion Pool Complex (Legion Pool, Legion Pool Bathhouse/Pavilion, and Legion Field) located at 802 S. Lumpkin Street, Athens, Clarke County, Georgia. The redevelopment includes removal of Legion Pool (#2604) and the Legion Pool Bathhouse/Pavilion (#2605), expansion of Legion Field into additional greenspace and an amphitheater, and the addition of 70 student parking spaces near residence halls.

Having reviewed this proposed project and the GEPA evaluation report from Geo-Hydro Engineers, I have determined that there will be a significant adverse effect on the quality of the environment as it relates to the impact to a property with historic significance under the National Register of Historic Places Criteria A and C.

Matt Sammons
GEPA Coordinator
Environmental Safety Division

Adam Fouche
Interim Associate Vice President
Environmental Safety, Risk, and Resiliency