



December 2020 | Response to Comments

# ABRAHAM LINCOLN HIGH SCHOOL

Comprehensive Modernization Project

*Prepared for:*

**Los Angeles Unified School District**  
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# 1. Introduction

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## 1.1 INTRODUCTION

This document includes a compilation of the public comments received on the Lincoln High School Comprehensive Modernization Project Mitigated Negative Declaration (MND), supporting Initial Study, and provides Los Angeles Unified School District's (LAUSD's) responses to the comments.

Under the California Environmental Quality Act (CEQA), a lead agency has no affirmative duty to prepare formal responses to comments on an MND. The lead agency, however, should have adequate information on the record explaining why the comments do not affect the conclusion of the MND. In the spirit of public disclosure and engagement, the LAUSD—as the lead agency for the proposed comprehensive modernization project—has responded to all written comments submitted during the 30-day MND public review period, which began on October 13, 2020 and closed on November 12, 2020.

## 1.2 PUBLIC ENGAGEMENT

**Notice of Intent to Adopt a Negative Declaration.** Per CEQA Guidelines Section 15072 and 15073, the LAUSD determined that an MND would be required for the proposed Project and circulated a Notice of Intent to Adopt a Mitigated Negative Declaration (NOI) and the MND. The NOI and MND were posted on LAUSD's website at: <http://achieve.lausd.net/ceqa>. The NOI was available in three languages including English, Spanish and Mandarin Chinese. Public outreach for the MND included the following methods.

### Newspaper Publication

- The NOI was published in the Los Angeles Daily News (English) on October 14, 2020.
- The NOI was published in La Opinion (Spanish) on October 15, 2020.
- The NOI was published in the Chinese Daily News (Mandarin Chinese) on October 13, 2020.

### Document Posting

- A copy of the NOI was posted in the Lincoln High School (Lincoln HS) administration office.
- A laminated banner of the NOI was posted along the main entry/exit gate for Lincoln HS across from the intersection of Lincoln Park Avenue and Altura Street. This entry/exit gate was the primary access point for those entering the school and was the only one active at that time.
- A copy of the NOI was mailed to the Los Angeles County Clerk for posting.
- Electronic copies of the NOI and MND were posted on LAUSD's website (<http://achieve.lausd.net/ceqa>); the Lincoln High School website (<https://www.lincolnhs.org/>); and State Clearinghouse (<https://www.opr.ca.gov/clearinghouse/ceqa/>).

## 1. Introduction

### Document Distribution

- The NOI and MND were filed with the State Clearinghouse (SCH: 2020100225) for distribution to applicable state agencies.
- A copy of the NOI was sent to:
  - Addresses within 0.25 mile radius of the project site;
  - Local and regional agencies;
  - Interested Parties; and
  - Guardians of Lincoln HS Students.

### Community Meeting

A community meeting for the proposed Project was held on October 26, 2020. The community meeting was held via zoom and included Spanish and Mandarin Chinese interpretation. The community meeting included an overview of the Project, presented the updated Project design, anticipated schedule, findings of the Preliminary Environmental Assessment (PEA-E) and MND findings. Members of the public were provided an opportunity to make comments and ask questions during the public meeting. Comments were received from Erik Van Breene and Stephen Sariñana-Lampson.

## 1.3 DOCUMENT FORMAT

This document is organized as follows:

***Section 1, Introduction.*** This section describes CEQA requirements and the content of this document.

***Section 2, Response to Comments.*** This section provides a list of agencies and interested persons commenting on the MND, copies of comment letters received during the public review period, and individual responses to written comments. To facilitate review of the responses, each comment letter has been reproduced and assigned a number. Individual comments have been numbered in each letter, and the letter is followed by responses from LAUSD with references to the corresponding comment number.

## 1.4 CEQA REQUIREMENTS REGARDING COMMENTS AND RESPONSES

CEQA Guidelines Section 15204 (b) outlines parameters for submitting comments on mitigated negative declarations, and reminds persons and public agencies that the focus of review and comment of MNDs should be “on the proposed findings that the project will not have a significant effect on the environment.” If the commenter believes that the project may have a significant effect, they should: (1) Identify the specific effect, (2) Explain why they believe the effect would occur, and (3) Explain why they believe the effect would be significant.

Comments are most helpful when they suggest additional specific alternatives or mitigation measures that would provide better ways to avoid or mitigate the significant environmental effects. At the same time, reviewers

## 1. Introduction

should be aware that the adequacy of a MND is determined in terms of what is reasonably feasible. CEQA Guidelines Section 15204 (c) advises, “[re]viewers should explain the basis for their comments, and should submit data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the comments. Pursuant to Section 15064, an effect shall not be considered significant in the absence of substantial evidence.”

Section 15204 (d) also states, “[e]ach responsible agency and trustee agency shall focus its comments on environmental information germane to that agency’s statutory responsibility.” Section 15204 (e) states, “[t]his section shall not be used to restrict the ability of reviewers to comment on the general adequacy of a document or of the lead agency to reject comments not focused as recommended by this section.”

Finally, CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. Written responses to comments are not required for MNDs; however, it is LAUSD’s policy to respond in writing to all comments. When responding to comments, lead agencies need only respond to potentially significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the environmental document.

## 1. Introduction

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## 2. Response to Comments

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This section provides a summary of verbal comments received during the community meeting (Table 2-1) and written comments received on the circulated MND (Table 2-2) and the District's response to comments. Verbal comments received and comment letters are given letters and numbers for reference purposes.

**Table 2-1: Public Meeting Comments (Verbal)**

<b>Public Speaker</b>	<b>Commenting Person / Agency</b>	<b>Community Meeting</b>	<b>Page Number</b>
A	Erik Van Breene	October 26, 2020	2-2
B	Stephen Sariñana-Lampson	October 26, 2020	2-3

**Table 2-2: Comment Letters Received During the MND Public Review**

<b>Comment Letter Reference</b>	<b>Commenting Person / Agency</b>	<b>Date of Comment</b>	<b>Page Number</b>
C	Miya Edmonson, California Department of Transportation	October 20, 2020	2-4
D	Adrian Scott Fine, Los Angeles Conservancy	November 12, 2020	2-7

## 2. Response to Comments

### A. Response to Comments from Erik Van Breene, from the October 26, 2020 Community Meeting.

- A-1 ***Mr. Van Breene indicated that it appears there will be extensive remodeling of interiors of the Administration and Home Economics Buildings. This raises concerns over retention of historic character defining features and finishes. What reasons exist for moving historic features from their original location to other buildings? (i.e., Benches in Administration to Home Economics Building).***

Furniture and artwork are not considered “characteristic” of the historic buildings at Lincoln HS. In addition, the building interiors at Lincoln have been significantly modified over the years. However, the District still recognizes the importance of these items to the greater school community. These items will be stored and reinstalled in their original locations whenever possible, although a few items will be relocated because of changing spaces and dimensions post-project. As evaluated, the space with the most interior character is the Auditorium, where most of the features are being retained or, in some cases, enhanced.

LAUSD will also implement several LAUSD Standard Conditions of Approval that will ensure compliance with the Secretary of the Interior’s Standards for Treatment of Historic Properties and LAUSD Guidelines and Treatment Approaches for Historic Schools that address the commenter’s concerns about historic character defining features. Specifically, SC-CUL-1, SC-CUL-2, and SC-CUL-5 as outlined in section V, Cultural Resources of the IS.

- A-2 ***In 2018 RINCON historic resources assessment, Building 10 (Music Building 1) and Buildings 11 and 12 (Classroom buildings) were identified as contributors to the 1968 Blowout historic district on campus. These were not included in the HRG assessment. Under the proposed plan Building 10 will be demolished because of critical conditions, what are these conditions?***

LAUSD proposes to complete the proposed Project in an effort to provide facilities that are safe, secure, and aligned with the instructional program (per section 3, Project Description of the IS). Assessments of the buildings on campus are used during the District’s planning and design process to define the scope of the proposed Project. It was during this process that Building 10 (Music Building 1) was identified as having poor mechanical, electrical/lighting, plumbing, data systems and not meeting meet the current code for fire life safety.

The 2018 Historic Resource Assessment Report for Lincoln High School was a preliminary review of the campus. It identified Buildings 10, 11 and 12 as potential contributors to the Historic District because they were in existence at the time of the 1968 Blowouts. However, Historic Resources Group (HRG) researched how buildings and places associated with civil rights related historic events are identified. They found that buildings that provided a backdrop to these events are the ones identified as significantly associated. In the case of Lincoln and the blowouts, the front lawn and buildings that frame (i.e., the Administration Building and Auditorium Building) were identified as the backdrop of the blowouts. Students gathered in the lawn area and marched in front of the school along N. Broadway during the historic event. The contributing buildings identified by HRG served as the backdrop in much of the media images produced at the time documenting the event. The other buildings are located behind the Administration Building and were not visible. Therefore, they do not contribute to the civil rights event that gives this campus historic significance.

## 2. Response to Comments

### B. Response to Comments from Stephen Sariñana-Lampson, from the October 26, 2020 Community Meeting.

- B-1 *Mr. Sariñana-Lampson asked why were only shallow borings initially taken on the east campus site and athletic field when it sits on an earthquake fault and there have been documented slippages above the tennis courts?*

A geotechnical report was completed for this Project and borings were taken based upon the known scope of the Project at the time the report was completed. As noted in section VII, Geology and Soils of the IS/MND, according to the Preliminary Geotechnical Investigation Lincoln High School, the closest known active fault to the site with evidence of surface rupture is the Raymond Fault which is located approximately 2.9 miles north of the site. As further noted in the IS/MND, review of regional faults did not identify any known active or potentially active faults that have been recognized as crossing or projecting toward the Lincoln HS site. However, should the scope of the Project is updated to include development within an expanded area, additional borings will be completed at that time. Additionally, all development will comply with the District, California Geological Survey (CGS), and Department of State Architect (DSA) guidelines and standards to ensure the safety and security of each development.

## 2. Response to Comments

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY Gavin Newsom, Governor

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**Letter C**

**Governor's Office of Planning & Research**

**Oct 20 2020**

**STATE CLEARINGHOUSE**

  
*Making Conservation  
a California Way of Life.*

October 20, 2020

Eimon Smith  
Los Angeles Unified School District  
Office of Environmental Health & Safety  
333 South Beaudry Avenue, 21st Floor  
Los Angeles, CA 90017

RE: Abraham Lincoln High School  
Comprehensive Modernization Project –  
Mitigated Negative Declaration (MND)  
SCH # 2020100225  
GTS # 07-LA-2020-03392  
Vic. LA-110/PM: 26.597

Dear Eimon Smith:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced MND. The proposed project includes new buildings, such as a 2-story classroom building, performing arts building, Maintenance and Operations building, and field house restroom building, as well as facilities for the Pueblo de Los Angeles Continuation High School. The proposed project also includes modernization of existing structures and site improvements, including utility upgrades, access upgrades to meet programmatic requirements of the Americans with Disabilities Act, and landscape improvements. Finally, the project includes demolition of the music building, storage building, shop building, Pueblo de Los Angeles Continuation High School, and 7 portable buildings. The project will not increase student capacity. The Los Angeles Unified School District (LAUSD) is the Lead Agency under the California Environmental Quality Act (CEQA). C-1

The project is located near the following state facilities:

- **Interstate 5 (I-5):** approximately 5,000 feet from the I-5 and N Broadway interchange.
- **Interstate 110 (I-110):** approximately 1.25 miles away from the I-5 and I-110 interchange.
- **Interstate 10 (I-10):** approximately 1.5 miles away from the I-10 and I-5 interchange.

From reviewing the MND, Caltrans concurs with the following: "As part of long-term Project operations, the proposed Project would not increase student capacity thereby it would not substantially increase VMT. Therefore, VMT with implementation of the proposed Project is anticipated to be similar to existing conditions. Project impacts would be less than significant and no further analysis is required."

Therefore, the following information is included for your consideration. C-2

The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. Furthermore, Caltrans encourages Lead Agencies to implement Transportation Demand Management (TDM) strategies that reduce VMT and Greenhouse Gas (GHG) emissions. Thus, Caltrans supports the TDM strategies this project has incorporated, such as the

*"Provide a safe, sustainable, integrated and efficient transportation system  
to enhance California's economy and livability"*

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October 20, 2020  
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upgrades to the pedestrian bridge. Additional TDM strategies that LAUSD may want to consider integrating into this project in order to further reduce VMT include:

- Ensure that project driveway placements do not directly cause issues related to line of sight of pedestrians or bicyclists.
- Verify that no more parking than required by the local permitting agency is provided.
- Provide sufficient bicycle parking for students and employees.

**C-2  
cont.**

Also, any transportation of heavy construction equipment and/or materials which requires use of oversized-transport vehicles on State highways will need a Caltrans transportation permit. Caltrans supports the following measure: "LAUSD shall encourage its Construction Contractor to limit construction-related trucks to off-peak commute periods." If construction traffic is expected to cause delays on any State facilities, please submit the Construction Worksite Traffic Control Plan detailing these delays for Caltrans' review.

**C-3**

If you have any questions about these comments, please contact Emily Gibson, the project coordinator, at [Emily.Gibson@dot.ca.gov](mailto:Emily.Gibson@dot.ca.gov), and refer to GTS # 07-LA-2020-03392.

Sincerely,

*Miya Edmonson*

MIYA EDMONSON  
IGR/CEQA Branch Chief  
cc: Scott Morgan, State Clearinghouse

*"Provide a safe, sustainable, integrated and efficient transportation system  
to enhance California's economy and livability"*

## 2. Response to Comments

### C. **Response to Comments from Miya Edmonson, California Department of Transportation, October 20, 2020.**

- C-1 Caltrans thanked the LAUSD for including them in the environmental review process for the proposed Project; provided a general summary of the Project description; indicated the location of State facilities within proximity to the Project site; and concurred with the MND finding that Project impacts would be less than significant and no further analysis is required. No issues related to the adequacy of the environmental analysis in the IS/MND were raised; therefore, no further response is necessary.
- C-2 The Commenter suggests various Transportation Demand Management (TDM) strategies to reduce vehicle miles traveled (VMT) and Greenhouse Gas (GHG) emissions for LAUSD's consideration. No issues related to the adequacy of the environmental analysis in the MND were raised; therefore, no further response is necessary.
- C-3 LAUSD acknowledges that any transportation of heavy construction equipment and/or materials which requires use of oversized-transport vehicles on State highways will need a Caltrans transportation permit; that large size truck trips should be limited to off-peak commute periods; and that a Construction Traffic Worksite Traffic Control Plan would be needed if construction traffic would cause delays on State facilities. No issues related to the adequacy of the environmental analysis in the IS/MND were raised; therefore, no further response is necessary.

## 2. Response to Comments

### Letter D



November 12, 2020

Eimon Smith, CEQA Project Manager  
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**RE: Comments for Initial Study/Mitigated Negative Declaration for the Lincoln High School Comprehensive Modernization Project**

Dear Ms. Smith:

On behalf of the Los Angeles Conservancy, thank you for the opportunity to comment on the Initial Study/Mitigated Negative Declaration for the Lincoln High School Comprehensive Modernization Project. The Conservancy has long recognized the important layered history and rare collection of historically significant buildings present at the Lincoln High School campus.

The significance of this National Register-eligible historic school campus is multi-layered for its associations with (1) early 20<sup>th</sup> century school development in Los Angeles, including remnant features from when the school was initially established in 1913; (2) the 1968 Chicano Student Walkouts; (3) longtime Lincoln High principal and AARP founder Dr. Ethel Percy Andrus; (4) Lincoln High teacher Sal Castro; and (5) the work of prominent Los Angeles architect Albert C. Martin as an excellent example of PWA Moderne style architecture. Therefore, we appreciate LAUSD's sensitivity toward this historic school campus overall and preservation-minded approach to its rehabilitation and modernization, retaining the core buildings that establish its historic significance and impart its story.

D-1

#### **Evaluate and Retain Important Character-Defining Interior Spaces**

We raise a couple of questions and potential concerns regarding some of the proposed interior modifications and details to various district contributing buildings as part of this project. It appears that numerous interior spaces will be altered and potentially result in an adverse change as part of the project's scope. We fully understand this result as part of classroom reconfigurations however it would be helpful to have a greater understanding of proposed changes to some of the public spaces and areas of assembly. Many are highly intact and date directly to the school's period of significance and events.

D-2



## 2. Response to Comments

The Historic Resources Group's (HRG) 2018 *Historic Resources Assessment Report for Lincoln High School*, as referenced in the MND's Cultural Resources section, states the remodel and modernization of historic district contributors including the Administration (Building 2), Auditorium (Building 3), Home Economics (Building 4), Gymnasium (Building 7), Music (Building 9), Food Service Building (Building 16) and the Pedestrian Bridge (Building 15) "have the potential to cause a substantial adverse change," potentially jeopardizing historic eligibility. This also includes proposed site improvements. The Conservancy is especially concerned as some of these features are important in visually relaying the history of the school, including the public area on the first floor of the Administration Building and the Auditorium. Both of these spaces, for instance, can be maintained while still meeting the educational facility needs.

D-3

How is LAUSD planning to mitigate these adverse changes, and adhere to the Secretary of the Interior's Professional Qualifications Standards to ensure compliance with the *Secretary of the Interior's Standards for the Treatment of Historic Properties* and LAUSD requirements and guidelines for the treatment of historical resources?

We raise these concerns as we are presented with limited analysis within the Initial Study. Why did HRG cite possible adverse changes to district contributors, and our understanding is their cultural resources assessment did not evaluate the interiors of contributing buildings? We strongly urge LAUSD to expand its analysis to identify historic character-defining interior spaces, features, and finishes of contributing buildings to plan for retention and preservation of historic materials and features.

D-4

As the legacy of the national and local public works effort, the historic Lincoln High School campus and buildings represent a limited, and increasingly diminishing, resource type. The four district contributing buildings are unified through a number of distinct exterior and interior architectural details characteristic of the PWA Moderne style.

In conclusion, the Conservancy greatly appreciates LAUSD's preservation-based approach to Lincoln High School's remodel and modernization. Given structural and accessibility upgrades proposed for all district contributing buildings, we do however have some concerns over the potential loss of character-defining interior spaces. For this reason, we urge you to expand your historic resource assessment and develop approaches that can avoid adverse changes and the loss of important interior spaces and features.

D-5

Thank you again for the opportunity to comment. We welcome talking further to discuss our comments in more detail so please feel free to contact me at [afine@laconservancy.org](mailto:afine@laconservancy.org).

Sincerely,



Adrian Scott Fine  
Director of Advocacy



## 2. Response to Comments

### D. Response to Comments from Adrian Scott Fine, Los Angeles Conservancy, November 12, 2020.

D-1 Mr. Fine, Director of Advocacy at the Los Angeles Conservancy thanked LAUSD for providing the opportunity to comment on the IS/MND; provided a general summary of the historic nature of the campus; and appreciated LAUSD's sensitivity and preservation minded approach to the rehabilitation and modernization of the Lincoln HS Campus. No issues related to the adequacy of the environmental analysis in the IS/MND were raised; therefore, no further response is necessary.

D-2 The Commenter expressed potential concerns regarding proposed interior modifications and would like more details of proposed changes.

Furniture and artwork are not considered "characteristic" of the historic buildings at Lincoln HS. In addition, the building interiors at Lincoln have been significantly modified over the years. That said, the District still recognizes the importance of these items to the greater school community. As previously noted in response A-1, these items will be stored and reinstalled in their original locations whenever possible, although a few items will need to be relocated because of changing spaces and dimensions post-Project. The space with the most interior character is the Auditorium, where most of the features are being retained or, in some cases, even enhanced.

Furthermore as noted on MND page 71, throughout the proposed Project, LAUSD shall implement processes and professionals who meet the Secretary of the Interior's Professional Qualifications Standards to ensure compliance with the Secretary of the Interior's Standards for the Treatment of Historic Properties and LAUSD requirements and guidelines for the treatment of historical resources. Implementation of SC-CUL-1, SC-CUL-2, SC-CUL-3, SC-CUL-4, and SC-CUL-5 contain processes that ensure the proposed Project conforms to the Secretary of the Interior's Standards for the Treatment of Historic Properties and incorporate features that reduce impacts to the proposed Project to less than significant.

D-3 The commenter noted that the historic resources report indicated potential impacts and would like to know how LAUSD plans to mitigate adverse changes to historic resources and adhere to the Secretary of the Interior's Professional Qualification Standards to ensure compliance with the Secretary of the Interior's Standards for the treatment of Historic Properties and LAUSD's requirements and guidelines for treatment of historic resources.

As documented in section V. Cultural Resources of the IS/MND, the Project as proposed would not be anticipated to result in any adverse impact to the historic districts that were identified on the campus. As further noted, LAUSD shall implement processes and provide professionals who meet the Secretary of the Interior's Professional Qualifications Standards to ensure compliance with the Secretary of the Interior's Standards for the Treatment of Historic Properties and LAUSD requirements and guidelines for the treatment of historical resources. LAUSD has SCs for minimizing impacts to cultural resources. Applicable SCs related to cultural resources impacts associated with the proposed Project include SC-CUL-1 through SC-CUL-10, as provided in the IS/MND and as listed in the following table:

## 2. Response to Comments

### LAUSD Standard Conditions of Approval

<p>SC-CUL-1</p>	<p><b>Historic Architect</b></p> <p>For projects involving structural upgrades to historic resources, the Design Team shall include a qualified Historic Architect with demonstrated project-level experience in historic projects.</p> <p>For campuses with qualifying historical resources under CEQA, the Design Team shall include a LAUSD-qualified Historic Architect. The Historic Architect/s shall meet the Secretary of the Interior’s Professional Qualifications Standards and the standards described on page 8 of the LAUSD Design Guidelines and Treatment Approaches for Historic Schools.</p> <p>Throughout the project design progress the Historic Architect shall provide input to ensure compliance with the Secretary of the Interior’s Standards for the Treatment of Historic Properties and LAUSD requirements and guidelines for the treatment of historical resources.</p> <p><b>Role of the Historic Architect</b></p> <p>The tasks of the Historic Architect on the Design Team shall include, but are not limited to:</p> <ul style="list-style-type: none"> <li>• The Historic Architect shall work with the Design Team (including the Structural Engineer) and LAUSD to ensure that project components, including new construction and modernization of existing facilities, comply with the Secretary of the Interior’s Standards for the Treatment of Historic Properties and LAUSD Design Guidelines and Treatment Approaches for Historic Schools. The Historic Architect shall work with the Design Team and LAUSD throughout the design process to develop project options that facilitate compliance with the applicable historic preservation standards.</li> <li>• For new construction, the Historic Architect shall work with the Design Team and LAUSD to identify options and opportunities for: (1) ensuring compatibility of scale and character for new construction, site and landscape features, and circulation corridors, and (2) ensuring that new construction is designed and sited in such a way that reinforces and strengthens, as much as feasible, character-defining site plan features, landscaping, and circulation corridors throughout Campus.</li> <li>• For modernization and upgrade projects involving contributing (significant) buildings or features, the Historic Architect shall work with the Design Team and LAUSD to ensure that specifications for design and implementation of projects comply with the applicable historic preservation standards.</li> </ul> <p>The Historic Architect shall participate in Design Team meetings during all phases of the project through 100% construction drawings, pre-construction, and construction phases, as applicable.</p> <p>The Historic Architect shall prepare a memo at the 50% and at the 100% construction drawings stages, demonstrating how principal project components and treatment approaches comply with applicable historic preservation standards, including the Secretary of the Interior’s Standards for the Treatment of Historic Properties and LAUSD Design Guidelines and Treatment Approaches for Historic Schools. The memos shall be submitted to LAUSD OEHS for review.</p> <p>The Historic Architect shall participate in pre-construction and construction monitoring activities, as appropriate, to ensure continuing conformance with Secretary’s Standards and/or avoidance of a material impairment of the historical resources.</p> <p>The Historic Architect shall provide specifications for architectural features or materials requiring restoration or removal, maintaining and protecting relevant features in place, or on-site storage. Specifications shall include detailed drawings or instructions where historic features may be impacted.</p> <p>The Design Team and Historic Architect shall be responsible for incorporating LAUSD’s recommended updates and revisions during the design development and review process.</p>
<p>SC-CUL-2</p>	<p>LAUSD shall follow the guidelines outlined in these documents to the maximum extent practicable when planning and implementing projects and adjacent new construction involving historical resources.</p> <p>The Design Team, Historic Architect, and Construction Contractor shall apply LAUSD School Design Guide and LAUSD Design Guidelines and Treatment Approaches for Historic Schools and the Secretary’s Standards for all new construction and modernization projects. In keeping with the District’s adopted policies and goals, historical resources shall be reused rather than destroyed, where feasible.</p>

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	<p>General guidelines include:</p> <ul style="list-style-type: none"> <li>• Retain and preserve the character of historic resources.</li> <li>• Repair rather than remove, replace, or destroy character-defining features; if replacement is necessary, replace in-kind to match materials, dimensions, and appearance.</li> <li>• Treat distinctive architectural features or examples of skilled craftsmanship that characterize a building with sensitivity.</li> <li>• Where practical, conceal reinforcement required for structural stability or the installation of life safety or mechanical systems.</li> <li>• Where necessary to halt deterioration and after the preparation of a condition assessment, undertake surface cleaning, preparation of surfaces, and other projects involving character-defining features using the least invasive, gentlest means possible. Avoid using any abrasive materials or methods including sandblasting and chemical treatments.</li> </ul>
<p>SC-CUL-3</p>	<p>Prior to any major alteration to or adjacent to a historic resource that may potentially damage historic resources (or previously identified historic features), the Historic Architect shall develop a Temporary Protection Plan that identifies potential risks to the historic resource. The Temporary Protection Plan shall be prepared in coordination with the Construction Contractor and LAUSD prior to demolition or construction. The Temporary Protection Plan may include, but not be limited to, the following components:</p> <ul style="list-style-type: none"> <li>• Notation of the historic resource on construction plans.</li> <li>• Pre-construction survey to document the existing physical condition of the historic resource.</li> <li>• Procedures and timing for the placement and removal of temporary protection features, around the historic resource.</li> <li>• Monitoring of the installation and removal of temporary protection features by the Historic Architect, or designee.</li> <li>• Post-construction survey to document the condition of the historic resource after Project completion.</li> </ul> <p>Preparation of a technical memorandum documenting the pre-construction and post-construction conditions of the historic resource and compliance with protective measures outlined Temporary Protection Plan.</p>
<p>SC-CUL-4</p>	<p>Prior to significant alteration or demolition of a historical resource, LAUSD shall retain an Architectural Photographer and/or a Historian or Architectural Historian who meet the Secretary of the Interior's Professional Qualifications Standards and who shall prepare a HABS-like Historic Documentation Package (Package).</p> <p>The Package shall include photographs and descriptive narrative. Documentation will draw upon primary- and secondary-source research including available studies prepared for the property (measured drawings are not required). The specifications for the Package include:</p> <ul style="list-style-type: none"> <li>• <b>Photographs:</b> Photographic documentation shall focus on the historical resources/features proposed to be significantly altered or demolished, with overview and context photographs for the Campus and adjacent setting. A professional-quality camera will be used to take photographs of interior and exterior features of the buildings. Photographs will include context views, elevations/exteriors, architectural details, overall interiors, and interior details (if warranted). Digital photographs will be in black and white (as well as in color or as requested by the District) and provided in an electronic format.</li> <li>• <b>Descriptive and Historic Narrative:</b> The Historian or Architectural Historian shall prepare descriptive and historic narrative of the historical resources/features. Physical descriptions will detail each resource, elevation by elevation, with accompanying photographs and information on how the resource fits within the broader Campus during its period of significance. The historic narrative will include available information on the Campus design, history, architect/contractor/designer as appropriate, history of the area, and historic context. In addition, the narrative will include a methodology section specifying the name of researcher, date of research, and sources/archives visited, as well as a bibliography. Within the written history, statements shall be footnoted as to their sources, where appropriate.</li> <li>• <b>Historic Documentation Package Submittal:</b> Upon completion of the descriptive and historic narrative, all materials will be compiled in electronic format and presented to LAUSD for review and comment. Upon approval, one electronic copy and one hard copy shall be submitted to LAUSD OEHS. Photographs will be individually labeled and provided to LAUSD in electronic format.</li> </ul>

## 2. Response to Comments

SC-CUL-5	LAUSD shall comply with Design Specification 01 3591, Historic Treatment Procedures, as applicable. This Specification requires the Construction Contractor to submit a Historic Treatment Plan to the District for the protection, repair, and replacement of historic materials and features.
SC-CUL-6	<p>LAUSD shall retain a qualified Archaeologist to be available on-call. The Archaeologist shall meet the Secretary of the Interior's Professional Qualifications Standards (48 Federal Register 44738–39). The archaeologist must have knowledge of both prehistoric and historical archaeology.</p> <p>To reduce impacts to previously undiscovered buried archaeological resources, following completion of the final grading plan and prior to any ground disturbance, a qualified archaeologist shall prepare an Archaeological Monitoring Program as described under SC-CUL-7.</p>
SC-CUL-7	<p>The Construction Contractor shall halt construction activities within a 30 foot radius of the find and shall notify the LAUSD.</p> <ul style="list-style-type: none"> <li>• LAUSD shall retain an Archaeologist that meets the Secretary of the Interior's Professional Qualifications Standards (48 Federal Register 44738–39). The archaeologist must have knowledge of both prehistoric and historical archaeology.</li> <li>• The Archaeologist shall have the authority to halt any project-related construction activities that could impact potentially significant resources.</li> <li>• The Archaeologist shall be afforded the necessary time to recover and assess the find. Ground-disturbing activities shall not continue until the discovery has been assessed by the Archaeologist. With monitoring, construction activities may continue on other areas of the project site during evaluation and treatment of historic or unique archaeological resources.</li> <li>• If the find is determined to be of value, the Archaeologist shall prepare an Archaeological Monitoring Program and shall monitor the remainder of the ground-disturbing activities.</li> <li>• Significant archaeological resources found shall be curated as determined necessary by the Archaeologist and offered to a local museum or repository willing to accept the resource.</li> <li>• Archaeological reports shall be submitted to the South Central Coastal Information Center at the California State University, Fullerton.</li> <li>• The Archaeological Monitoring Plan shall include: <ul style="list-style-type: none"> <li>○ Extent and duration of the monitoring based on the grading plans</li> <li>○ At what soil depths monitoring of earthmoving activities shall be required</li> <li>○ Location of areas to be monitored</li> <li>○ Types of artifacts anticipated</li> <li>○ Procedures for temporary stop and redirection of work to permit sampling, including anticipated radius of suspension of ground disturbances around discoveries and duration of evaluation of discovery to determine whether they are classified as unique or historical resources</li> <li>○ Procedures for maintenance of monitoring logs, recovery, analysis, treatment, and curation of significant resources</li> <li>○ Procedures for archaeological resources sensitivity training for all construction workers involved in moving soil or working near soil disturbance, including types of archaeological resources that might be found, along with laws for the protection of resources. The sensitivity training program shall also be included in a worker's environmental awareness program that is prepared by LAUSD with input from the Archaeologist, as needed.</li> <li>○ Accommodation and procedures for Native American monitors, if required.</li> <li>○ Procedures for discovery of Native American cultural resources.</li> </ul> </li> </ul> <p>The construction manager shall adhere to the stipulations of the Archaeological Monitoring Plan.</p>
SC-CUL-8	Cultural resources sensitivity training shall be conducted for all construction workers involved in ground-disturbing activities. This training shall review the types of archaeological resources that might be found, along with laws for the protection of resources and shall be included in a worker's environmental awareness program that is prepared by LAUSD with input from a qualified Archaeologist, as needed.
SC-CUL-9	LAUSD shall determine whether it is feasible to prepare and implement a Phase III Data Recovery/Mitigation Program. If feasible, the Archaeologist shall prepare a Phase III Data Recovery/Mitigation Program to outline procedures to recover a statistically valid sample of the archaeological remains and to document the site and

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	reduce impacts to be less than significant. All documentation shall be prepared in the standard format of the ARMR Guidelines, as prepared by the OHP. Once a Phase III Data Recovery/Mitigation Program is completed, an Archaeological Monitor shall be present to oversee the ground-disturbing activities to ensure that construction proceeds in accordance with the Program.
SC-CUL-10	All work shall stop within a 30-foot radius of the discovery. Work shall not continue until the discovery has been evaluated by a qualified Archaeologist and the local Native American representative has been contacted and consulted to assist in the accurate recordation and recovery of the resources.

As concluded in the IS, with implementation of cultural SCs (SC-CUL-1 through SC-CUL-10) project impact would be less than significant.

- D-4 Commenter indicates limited analysis in the initial study; would like to know why the HRG study cited possible adverse changes to district contributors; and strongly recommends an expansion of the analysis to identify historic-defining interior spaces, features, and finishes of contributing buildings to plan for retention and preservation of historic buildings and features.

The IS/MND incorporates the information provided in the HRG study. Based on the information available, LAUSD assumes the HRG study cited possible adverse changes would result from any changes made to the interior or exterior of district contributing buildings if the changes were not consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties because this language is the standard by which historic evaluations are completed under CEQA. As previously noted, the compliance with the Secretary of the Interior's Standards is a required component of the Project (as documented by the Project as defined and as evaluated with SCs SC-CUL-1, SC-CUL-,2 and SC-CUL-4 through SC-CUL-7).

The HRG study included a list of exterior character defining features for contributing buildings within the district and included as an attachment to the study a memorandum from Rincon Consultants, Inc. sent to LAUSD in 2017 (prior to the completion of the HRG study). This memorandum includes a brief list of some of the interior historic-defining spaces for four of the contributing buildings to the historic district. The entire HRG report, including the 2017 memorandum will be used in the planning and retention of historic buildings and features.

No further expansion of the HRG study is currently proposed. However, SC-CUL-1 and SC-CUL-2 will address the commenter's concerns related to historic-defining interior spaces, features, and finishes of contributing buildings. The Secretary of the Interior's Qualified Historic Architect, retained under SC-CUL-1, shall provide input throughout the design process to ensure compliance with the Secretary of the Interior's Standards for the Treatment of Historic Properties and LAUSD requirements and guidelines for the treatment of historical resources.

- D-5 Commenter indicates that Lincoln HS campus represents a limited and increasing diminishing resource type and is characteristic of the PWA Moderne style. The Conservancy greatly appreciates LAUSD's preservation approach. However, the Conservancy has concerns about the potential loss of character defining interior features and suggests further study.

LAUSD will take all the written comments received under consideration. The commenter provided a summary conclusion of their comment letter and LAUSD provided responses to these concerns in response to comments D1-D4. No additional response is needed.

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