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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 20th 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.

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.



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.

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.

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.

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.

Sincerely,



Adrian Scott Fine
Director of Advocacy

