

# Los Angeles Unified School District

## Office of Environmental Health and Safety

AUSTIN BEUTNER  
Superintendent of Schools

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Director, Environmental Health and Safety

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Deputy Director, Environmental Health and Safety

### NOTICE OF EXEMPTION

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ORIGINAL FILED

SEP 23 2019

LOS ANGELES, COUNTY CLERK

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**To:** County Clerk and Registrar-Recorder  
County of Los Angeles  
12400 Imperial Highway  
Norwalk, CA 90650

**From:** LAUSD OEHS  
333 South Beaudry Avenue  
21<sup>st</sup> Floor  
Los Angeles, CA 90017

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**Project Title:**

9<sup>th</sup> Street Elementary School Synthetic Field Replacement Project

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**Project Location – Specific:**

The 9th Street Elementary School Synthetic Turf Replacement Project (Project) will be located on the 3.34-acre 9th Street Elementary School (ES) campus. 9th Street ES is located at 835 S. Stanford Ave, Los Angeles, CA 90021. The school is bounded by Towne Ave. to the west, Stanford Ave. to the east, 8<sup>th</sup> Street to the north, and 9th St. to the south. The surrounding area is generally comprised of industrial land uses.

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**Project Location – City:**

Los Angeles

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**Project Location – County:**

Los Angeles

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**Description of Nature, Purpose, and Beneficiaries of Project:**

The Project will replace approximately 5,613 square feet of damaged and deteriorated synthetic infill, turf, and pad. The scope of work also includes providing 2 inches of compacted gravel on the play field, upgrading the running track, and the inspection of field drainage and irrigation and executing repairs, if needed. The Project will not result in an increase in the student enrollment or require an alteration of the current use, function, or capacity of the existing facilities or Campus

The Project will be implemented pursuant to all applicable State, federal, and local regulations and all applicable LAUSD specifications, standards, and/or guidelines, including those in compliance with the California Environmental Quality Act (CEQA) and the updated Standard Conditions of Approval for District Construction, Upgrade, and Improvements Projects as adopted by the Board of Education in February 2019 (SC).<sup>1</sup> LAUSD's SCs, design guidelines, and best management

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<sup>1</sup> LAUSD OELC, "Standard Conditions of Approval for District Construction, Upgrade, and Improvements Projects," Adopted by the Board of Education on February 5, 2019.

Doc# 663326

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*Our Mission: To ensure a safe and healthy environment for students to learn, teachers to teach, and employees to work.*

*Our Vision: To eliminate all environmental, health, and safety risks at schools.*

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practices are designed to be incorporated into the Project design in order to avoid or limit potential adverse impacts associated with the District's projects.

The beneficiaries of this Project are the 9<sup>th</sup> Street ES students, faculty, staff, families, school supporters, and the community at large who may request access to the Campus facilities and grounds pursuant to the Civic Center act (CA Ed. Code Sections 38130-38139).

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**Name of Public Agency Approving the Project:**

Los Angeles Unified School District

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**Name of Person or Agency Carrying Out Project:**

Los Angeles Unified School District

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**Exempt Status: (check one below)**

- Ministerial [Public Resources Code (PRC) Section 21080(b)(1); CEQA Guidelines Section 15268<sup>2</sup>]:
- Declared Emergency [PRC Section 21080(b)(3); CEQA Guidelines Section 15269(a)]:
- Emergency Project [PRC Section 21080(b)(4); CEQA Guidelines Section 15269(b)(c)]:
- Categorical Exemption (PRC Section 21084; CEQA Guidelines Sections 15300 -15333):
- *CEQA Guidelines Section 15301 – Existing Facilities*
  - *CEQA Guidelines Section 15302 – Replacement or Reconstruction*
  - *CEQA Guidelines Section 15304 – Minor Alterations to Land*
- Statutory Exemption:

**Reasons why project is exempt:**

Section 15301 - Existing Facilities

Class 1 consists of the operation, repair, maintenance, permitting, leasing, licensing, or minor alteration of existing public or private structures, facilities, mechanical equipment, or topographical features involving negligible or no expansion of use beyond that existing at the time of the lead agency's determination.

The Project consists of replacing approximately 5,613 square feet of damaged and deteriorated synthetic infill, turf, and pad. The scope of work also includes providing 2 inches of compacted gravel on the play field, upgrading the running track, and the inspection of field drainage and irrigation and executing repairs, if needed. The Project will not generate growth or require the addition or construction of new or expanded facilities. The Project will not present a new or expanded use of the turf field or campus. Therefore, the Project fulfills the requirements of CEQA Guidelines Section 15301.

Section 15302 - Replacement or Reconstruction

Class 2 consists of replacing or reconstructing existing structures and facilities where the new structure will be located on the same site as the structure replaced and will have substantially the same purpose and capacity as the structure replaced.

As previously noted, the Project will replace approximately 5,613 square feet of damaged and deteriorated synthetic infill, turf, and pad. The scope of work also includes providing 2 inches of compacted gravel on the play field, upgrading the running track, and the inspection of field drainage and irrigation and executing repairs, if needed. Following the Project, the turf field will have the same purpose, function, capacity, and use as the current turf field. The Project is not designed

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<sup>2</sup> CEQA Guidelines can be found at California Code of Regulations Title 14, Chapter 3, Section 15000 - Section 15387.

to and will not result in an increase or alteration of the current use, function, or capacity of the turf field or campus. Therefore, the Project fulfills the requirements of CEQA Guidelines Section 15302.

#### Section 15304 – Minor Alterations to Land

Class 4 consists of minor public or private alterations in the condition of land, water, and/or vegetation which do not involve removal of healthy, mature, scenic trees except for forestry or agricultural purposes.

The Project will replace approximately 5,613 square feet of damaged and deteriorated synthetic infill, turf, and pad. The scope of work also includes providing 2 inches of compacted gravel on the play field, upgrading the running track, and the inspection of field drainage and irrigation and executing repairs, if needed. The Project will not remove healthy, mature, scenic trees. Therefore, the Project fulfills the requirements of CEQA Guidelines Section 15304.

#### Section 15300.2 – Exceptions

Section 15300.2 of the CEQA Guidelines, Exceptions, provides conditions under which categorical exemptions are inapplicable. Review of the Project indicates that it will not violate any of the exceptions, as described in the following section.

1. *The project will occur in certain specified sensitive environments or locations;*

The Project will occur on an existing campus that is located within an urban setting.<sup>3</sup> The surrounding uses are primarily industrial. The campus has not been designated as a biologically sensitive site or location and does not contain sensitive resources or habitat that will be impacted by the Project. The nearest significant ecological area (SEA) is Griffith Park which is located approximately 6.3 miles northwest of the campus.<sup>4</sup> The nearest critical habitat is designated as such for the California Gnatcatcher and is located approximately 9.4 miles northeast of the site.<sup>5</sup> As such, the Project will not impact sensitive environments or locations.

2. *Cumulative impacts will be considerable because successive projects of the same type will occur at the same place over time;*

The Project will not be expected to result in significant cumulative environmental impacts. As an active school campus, it is anticipated that projects such as maintenance activities or upgrades will occur on the campus in the future. However, there are currently no known successive projects of the same type or scale planned for the campus. As it stands, the Project will not result in potentially significant impacts. Therefore, no cumulative impacts will result from the Project and successive projects of the same type and at the same place over time.

3. *There is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances;*

There are no known unusual circumstances that would have a significant effect on the environment. The Project will replace approximately 5,613 square feet of damaged and deteriorated synthetic infill, turf, and pad. The scope of work also includes providing 2 inches of compacted gravel on the play field, upgrading the running track, and the inspection of field drainage and irrigation and executing repairs, if needed. The Project does not constitute an expansion of use. There will be minor ground-disturbing activities associated with the installation of the

<sup>3</sup> City of Los Angeles. ZIMAS. Available at: <http://zimas.lacity.org/>. Accessed December 2018.

<sup>4</sup> Los Angeles County Department of Regional Planning, [http://gis.planning.lacounty.gov/GIS-NET3\\_Public/Viewer.html](http://gis.planning.lacounty.gov/GIS-NET3_Public/Viewer.html), accessed December 2018.

<sup>5</sup> United States Fish and Wildlife Service Critical Habitat Portal, <https://ecos.fws.gov/ecp/report/table/critical-habitat.html> accessed December 2018.



replacement synthetic turf. These activities are not considered unusual circumstances for the classes of projects under which an exemption is claimed. Nevertheless, consideration must be given to the management of pavement removal and excavated soils associated with earthwork activities for the Project. The Project involves the removal of asphalt and/or pavement, which requires soil sampling and testing for characterization prior to removal. OEHS must be notified to provide oversight of any import or export of soils and materials to ensure that these activities are conducted in compliance with the requirements of District Specification 01 4524, relevant provisions of South Coast Air Quality Management District Rule 1466, and other applicable environmental agency rules and requirements.<sup>6</sup> Furthermore, as set forth in standard conditions (SCs) SC-CUL-7, SC-CUL-9, SC-CUL-10, and SC-CUL-11 of the Standard Conditions of Approval for District Construction, Upgrade, and Improvements Projects as adopted by the Board of Education in February 2019,<sup>7</sup> and in District protocols, construction activities must be stopped immediately and OEHS notified upon discovery of subsurface features, such as buried resources (i.e., paleontological resources, archaeological resources), tanks or seepage pits, or stained/odoriferous soils.<sup>8</sup> Lastly, any construction and demolition waste shall be recycled to the maximum extent feasible per SC-USS-1.<sup>9</sup> Therefore, the Project will not have a significant effect on the environment due to unusual circumstances.

4. *The project may result in damage to scenic resources, including but not limited to trees, historic buildings, rock outcroppings, or similar resources within a highway officially designated as a scenic highway;*

The Project site is located approximately 12 miles southwest of State Route 2 (SR 2), the nearest officially designated State scenic highway.<sup>10</sup> The Project will not be visible from SR 2. Therefore, the Project will not result in damage to scenic resources or similar resources within a highway that is officially designated as a scenic highway.

5. *The project is located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code; or*

The Project will occur on an existing school campus which is not included on any list compiled pursuant to Section 65962.5 of the Government Code.<sup>11</sup> Therefore, the Project will not have an impact related to being located on a hazardous waste site.

6. *The project may cause a substantial adverse change in the significance of a historic resource.*

9<sup>th</sup> Street ES was originally opened in 1890, however the school was demolished and reconstructed in the early 1980s. Therefore 9<sup>th</sup> Street ES in its current configuration does not meet the age criteria for evaluation as a historical resource pursuant to CEQA. Therefore, the Project would not cause a substantial adverse change in the significance of a historic resource.<sup>12</sup>

<sup>6</sup> LAUSD OEHS, "Section 01 4524 Environmental Import/Export Materials Testing", [http://www.laschools.org/documents/file?file\\_id=219798234&show\\_all\\_versions\\_p=t](http://www.laschools.org/documents/file?file_id=219798234&show_all_versions_p=t)

<sup>7</sup> LAUSD OEHS, "Standard Conditions of Approval for District Construction, Upgrade, and Improvements Projects," Adopted by the Board of Education on February 5, 2019.

<sup>8</sup> *Ibid.*

<sup>9</sup> *Ibid.*

<sup>10</sup> Los Angeles County Department of Regional Planning, [http://gis.planning.lacounty.gov/GIS-NET3\\_Public/Viewer.html](http://gis.planning.lacounty.gov/GIS-NET3_Public/Viewer.html), accessed December 2018.

<sup>11</sup> California Department of Toxic Substances Control. DTSC Databases. Available at: <http://www.dtsc.ca.gov/database/>. Accessed December 2018.

<sup>12</sup> LAUSD OEHS. 2018. LAUSD Historic Resource Inventory Database.

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Prepared By:

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Signed by:



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Carlos A Torres,  
CEQA Officer of the Los Angeles Unified School District

Date:

8/29/19

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