

# Los Angeles Unified School District

## Office of Environmental Health and Safety

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### NOTICE OF EXEMPTION

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**ORIGINAL FILED**

JUN 14 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 S. Beaudry Avenue**  
**21st Floor**  
**Los Angeles, CA 90017**

#### Project Title:

Americans with Disabilities Act (ADA) Compliance Projects at Eight LAUSD Campuses (Groups 8)

#### Project Location – Specific:

- Bethune Middle School - 155 W 69th St, Los Angeles, CA 90003
- Eagle Rock Elementary School - 2057 Fair Park Ave, Los Angeles, CA 90041
- Graham Elementary School - 8407 S Fir Ave, Los Angeles, CA 90001
- Lowman Special Education and Career Transition Center - 12827 Saticoy St, North Hollywood, CA 91605
- Marshall High School - 3939 Tracy St, Los Angeles, CA 90027
- Ramona Elementary School - 1133 N Mariposa Ave, Los Angeles, CA 90029
- Russell Elementary School - 1263 Firestone Blvd, Los Angeles, CA 90001
- Sun Valley Middle School - 7330 Bakman Ave, Sun Valley, CA 91352

#### Project Location – City:

Various (see above)

#### Project Location – County:

Los Angeles

Doc# 697088

333 South Beaudry Avenue, 21<sup>st</sup> Floor, Los Angeles, CA 90017 • Telephone (213) 241-3199 • Fax (213) 241-6816

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

The scope of the project includes Americans with Disabilities Act (ADA) compliance improvements at eight Los Angeles Unified School District (LAUSD) school campuses: Bethune Middle School (MS), Eagle Rock Elementary School (ES), Graham ES, Lowman Special Education and Career Transition Center, Marshall High School (HS), Ramona ES, Russell ES, and Sun Valley MS (Campuses) (Project). These ADA compliance improvements are legal requirements mandated by the Division of State Architect (DSA) and may include one or more of the following: accessible route upgrades and barrier removal; ADA restroom upgrades; ADA compliant ramps; platform lifts installation; ADA compliant drinking fountains and sinks; accessible gates, doors, thresholds, &/or hardware; cafeteria counter modification; ADA compliant signage; accessible parking stalls/ loading zones; assembly seats modifications; locker room, nurse's exam room, dressing room modifications; railings modification; assistive listening devices/intercom/phones; existing elevator modifications; and new elevators. The table below summarizes the various ADA compliance improvements that would occur at each school as part of the Project.

**Summary of Proposed ADA Compliance Improvements at Each School**

School	Accessible Route Upgrades and Barrier Removal	ADA Restroom Upgrades	ADA Compliant Ramps	Platform Lifts Installation	ADA Compliant Drinking Fountains and Sinks	Accessible Gates, Doors, Thresholds, &/or Hardware	Cafeteria Counter Modification	ADA Compliant Signage	Accessible Parking Stalls/ Loading Zones	Assembly Seats Modifications	Locker Room, Nurse's Exam Room, Dressing Room Modifications	Railings Modification	Assistive Listening Devices/Intercom/Phones	Existing Elevator Modification	New Elevator
Bethune MS	X	X	X	X	X	X		X	X	X	X	X	X		
Eagle Rock ES	X	X	X	X	X	X		X	X	X		X	X	X	
Graham ES	X	X		X	X	X		X	X	X		X	X		X
Lowman	X	X			X	X		X				X			
Marshall HS	X	X	X	X	X	X		X	X	X	X	X	X	X	X
Ramona ES	X	X	X	X	X	X		X	X			X	X		X
Russell ES	X	X	X		X	X		X	X	X		X	X		
Sun Valley MS	X	X	X	X	X	X	X	X	X	X	X	X	X	X	



The Project will be constructed per DSA approved plans. The Project will be implemented per all applicable local and State regulations, as well as all District Standards and Specifications; such as those provided in LAUSD's Program Environmental Impact Report for the School Upgrade Program (Program EIR).<sup>1</sup> The primary purpose of the Project is to comply with current ADA access requirements. The Project would not cause an increase in student capacity or enrollment and would not result in an increase in the intensity of use. The beneficiaries of the Project include students and staff at each of the respective schools and the community at large who may request access to the facilities and grounds of the Campuses pursuant to the Civic Center Act (CA Ed. Code Sections 38130 - 38139).

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

Los Angeles Unified School District

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

Los Angeles Unified School District

**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 15303 – New Construction or Conversion of Small Structures*
  - *CEQA Guidelines Section 15311 – Accessory Structures*
- Statutory Exemption:

<sup>1</sup> LAUSD OEHS, "School Upgrade Program Final Environmental Impact Report," <http://achieve.lausd.net/ceqa>. Adopted by the Board of Education on November 10, 2015.

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

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**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 entails ADA compliance improvements at eight LAUSD Campuses. Such improvements may include, but are not limited to, accessible route upgrades and barrier removal; ADA restroom upgrades; ADA compliant ramps; platform lifts installation; ADA compliant drinking fountains and sinks; accessible gates, doors, thresholds, &/or hardware; cafeteria counter modification; ADA compliant signage; accessible parking stalls/ loading zones; assembly seats modifications; locker room, nurse's exam room, dressing room modifications; railings modification; assistive listening devices/intercom/phones; existing elevator modifications; and new elevators.

All of the proposed Project components would involve minor alterations to existing public structures and would occur within the area occupied by existing facilities at the Project sites. The Project components would not present a new or expanded use of the Project sites. Therefore, the Project constitutes minor alterations to existing school sites that result in no expansion of use and meets the requirements of CEQA Guidelines Section 15301.

Section 15302 Replacement or Reconstruction

Class 2 consists of replacement or reconstruction of 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.

The Project includes upgrades or replacement of existing structures and facilities, such as accessible route upgrades and barrier removal; ADA restroom upgrades; cafeteria counter modification; accessible parking stalls/ loading zones; assembly seats modifications; locker room, nurse's exam room, dressing room modifications; railings modification; assistive listening devices/intercom/phones; and existing elevator modifications. The Project would not change the location or the purpose of the structures and facilities being replaced and will not expand the capacity of the Campuses. Therefore, the Project satisfies the requirements of CEQA Guidelines Section 15302.

Section 15303 New Construction or Conversion of Small Structures

Class 3 consists of construction and location of limited numbers of new, small facilities or structures; installation of small new equipment and facilities in small structures; and the conversion of existing small structures from one use to another where only minor modifications are made to the structure.

The Project includes the construction and location of small new structures, such as the installation of ADA compliant ramps; installation of platform lifts; installation of ADA compliant drinking fountains and sinks; installation of accessible gates, doors, thresholds, and/or hardware; installation of ADA compliant signage; creation of accessible parking stalls and loading zones through restriping; and installation of a new elevator. The Project also includes the installation of small new equipment, such as the installation of assistive listening devices, intercoms, and/or phones. Therefore, the Project satisfies the requirements of CEQA Guidelines Section 15303.

Section 15311 Accessory Structures

Class 11 consists of construction or replacement of minor structures accessory to (appurtenant to) existing commercial, industrial, or institutional facilities, including, but not limited to, on premise signs and small parking lots.

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The Project includes the construction or replacement of minor structures accessory to existing institutional facilities, including accessible route upgrades and barrier removal; ADA compliant ramps; platform lifts installation; ADA compliant drinking fountains and sinks; accessible gates, doors, thresholds and/or hardware; cafeteria counter modification; ADA compliant signage; accessible parking stalls/ loading zones; assembly seats modifications; locker room, nurse's exam room, dressing room modifications; railings modification; assistive listening devices/intercom/phones; existing elevator modifications; and new elevators. Therefore, the Project satisfies the requirements of CEQA Guidelines Section 15311.

#### 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 they would not violate any of the exceptions, as described below.

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

The Project sites are fully developed Campuses within urbanized communities.<sup>3</sup> None of the Project sites have been designated as biologically sensitive locations. The nearest sensitive environment to the Project sites is the southwestern willow flycatcher, located approximately 3.84 miles northeast of Sun Valley ES.<sup>4,5</sup> As such, the Project will not impact sensitive environments or locations.

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

The Campuses are active school sites and there will likely be ongoing maintenance activities and minor Projects on the Campuses to keep the schools operational. As the Project would not result in any lasting impacts once construction of the Project is complete, the Project would not contribute to cumulative impacts when considered with expected successive projects.

3. *There is a reasonable possibility that the activity would 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 removal of trees is not anticipated as part of the proposed scope of work. However, should the Project be altered to include the removal of trees, LAUSD's Office of Environmental Health & Safety (OEHS) must be notified immediately. District policy requires consultation with an arborist to determine if the trees are a protected native species. Additionally, written approval from the school principal will be required before any trees can be removed. If tree removal is scheduled to occur between February 1 and August 31, a nesting bird survey would be performed prior to removal activities, per standard condition (SC) of approval SC-BIO-3 of the Program EIR.<sup>6</sup>

The Project may include minor ground-disturbing activities. 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. As the Project involves the removal of pavement, soil sampling and testing for characterization is required prior to demolition and removal of the paving materials. Excavated soils will only be reused onsite if they are

<sup>3</sup> City of Los Angeles Planning Department, *Zoning and Information Management System*, <http://zimas.lacity.org/>, accessed January 2019.

<sup>4</sup> United States Fish and Wildlife Service Critical Habitat Portal, <https://ecos.fws.gov/ecp/report/table/critical-habitat.html> accessed January 2019.

<sup>5</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 January 2019.

<sup>6</sup> LAUSD OEHS, "School Upgrade Program Final Environmental Impact Report," <http://achieve.lausd.net/ceqa>, Adopted by the Board of Education on November 10, 2015.

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placed beneath paved areas. If construction or earthmoving activities require import or export of soils and materials, OEHS must be notified to provide oversight 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>7</sup> Furthermore, as set forth in SC-CUL-6, SC-CUL-7, SC-CUL-10, and SC-CUL-11 of the Program EIR, 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 of the Program EIR.<sup>9</sup> Therefore, the Project would 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 state scenic highway;*

The closest designated state scenic highway to any of the Project sites is State Route 2 (SR2), which is located approximately 6.4 miles northeast of Eagle Rock ES.<sup>10</sup> In addition, the Project would not result in the removal of historic buildings, rock outcroppings, or other scenic resources. Therefore, the Project would not result in damage to scenic resources or similar resources within a highway officially designated as a state 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*

None of the Project sites are located on sites that are included on any list compiled pursuant to Section 65962.5 of the Government Code.<sup>11</sup> Therefore, the Project would have no impacts related to being located on a hazardous waste site.

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

Bethune MS, Graham ES, Lowman Special Education and Career Transition Center, and Russell ES are not eligible for federal, state, or local listing under any of the applicable criteria and are therefore not considered to be historical resources pursuant to CEQA. Therefore, Project activities at these schools would not cause a substantial adverse change in the significance of a historic resource.

LAUSD has identified Eagle Rock ES, Marshall HS, Ramona ES, and Sun Valley MS as eligible for listing as a historic resource per Section 18955 of the California State Historical Building Code (CHBC).<sup>12</sup> In accordance with CEQA Guidelines Section 15064.5(b)(3), a project that conforms to the *Secretary of the Interior's Standards for the Treatment of Historic Properties (Secretary's Standards)* is generally considered to be a project that will not cause a significant adverse impact. (14 CCR Section 15126.4(b)(1)). If a project meets the *Secretary's*

<sup>7</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>8</sup> LAUSD OEHS, "School Upgrade Program Final Environmental Impact Report," <http://achieve.lausd.net/ceqa>, Adopted by the Board of Education on November 10, 2015.

<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 January 2019.

<sup>11</sup> [http://www.dtsc.ca.gov/SiteCleanup/Cortese\\_List.cfm](http://www.dtsc.ca.gov/SiteCleanup/Cortese_List.cfm), accessed January 2019.

<sup>12</sup> State of California. 2003. State Historical Building Code, Health and Safety Code, Division 13, Part 2.7, Section 18955. Available at: [http://www.dgs.ca.gov/dsa/AboutUs/shbsb/shbsb\\_health\\_safety.aspx](http://www.dgs.ca.gov/dsa/AboutUs/shbsb/shbsb_health_safety.aspx). Also see California Building Standards Commission. 2014. California Code of Regulations, Title 24, California Historical Building Code, Section 8-101.2. Washington, DC. p. 4.

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*Standards*, the project can, in most cases, be considered categorically exempt from CEQA (14 CCR Section 15331) and qualify for a Notice of Exemption.

*Secretary's Standards* conformance reviews were completed by OEHS's Historic Preservation Specialist for all five historically eligible Campuses to ensure compliance with applicable guidelines (the *Secretary's Standards* and *Los Angeles Unified School District Design Guidelines and Treatment Approaches for Historic Schools (LAUSD Design Guidelines)*). The *Secretary's Standards* conformance reviews found that the Project conforms to the *Secretary's Standards* at all five Campuses.<sup>13</sup> As the work at the schools shall conform with the *Secretary's Standards* and the *LAUSD Design Guidelines*, OEHS' Historical Preservation Specialist has determined that the Project meets the requirements specified in CEQA Guidelines Section 15064.5(b)(3) and will not cause a substantial adverse change in the significance of a historical resource.

Should the scope of the Project activities be altered from the components that are described above, standard District procedure requires that OEHS must be notified immediately to ensure that these activities are conducted in compliance with the *Secretary's Standards* and would not cause a substantial adverse change in the significance of a historical resource.

Prepared By:

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Signed by:



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

Date:

5/29/2019

<sup>13</sup> LAUSD OEHS. 2019. "Eagle Rock ES SOIS Compliance Review" LAUSD OEHS. 2019. "Marshall HS SOIS Compliance Review" LAUSD OEHS. 2019. "Ramona ES SOIS Compliance Review" LAUSD OEHS. 2019. "Sun Valley MS SOIS Compliance Review"