

Los Angeles Unified School District

Office of Environmental Health and Safety

MICHELLE KING
Superintendent of Schools

DIANE PAPPAS
CEO, District Operations & Digital Innovations

ROBERT LAUGHTON
Director, Environmental Health and Safety

CARLOS A. TORRES
Deputy Director, Environmental Health and Safety

NOTICE OF EXEMPTION

PLACE
"FILED"
STICKER
HERE

ORIGINAL FILED

FEB 01 2018

LOS ANGELES, COUNTY CLERK

PLACE
"POSTED"
STICKER
HERE

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

From: LAUSD OEHS
333 South Beaudry Avenue
21st Floor
Los Angeles, CA 90017

Project Title:

Aragon Elementary School Main Building Seismic Retrofit Project

Project Location – Specific:

Aragon Elementary School (Campus) is located at 1118 Aragon Avenue, Los Angeles, California 90065. The Campus is located on a 3.5-acre site bound by Roseview Avenue to the northwest, Cypress Avenue to the southwest, Loosmore Street to the southeast, and Aragon Avenue to the northeast. The Aragon Elementary School Main Building Seismic Retrofit Project (Project) is focused on the Main Building, located in the northern portion of the Campus. The Main Building consists of three 2-story buildings, with the three sections constructed in 1925, 1936, and 1938.

The Campus is situated within a seismically active area, outside of the Alquist Priolo Special Study Zone.¹ The nearest fault is the Upper Elysian Park fault located about 2.3 miles from the Campus.

Project Location – City:

Los Angeles

Project Location – County:

Los Angeles

Description of Nature, Purpose, and Beneficiaries of Project:

The scope of the Project includes voluntary seismic upgrade of the building's structural systems to strengthen its seismic resistance; heating, ventilation, and air conditioning upgrade (HVAC); and implementing Americans with Disabilities Act (ADA)² compliance improvements. Seismic upgrades include shear wall (in-plane and out-of-plane) strengthening, wall pier flexural strengthening, coupling beam strengthening, diaphragm strengthening, wall anchorage and cross tie strengthening, and foundation dowel strengthening. HVAC upgrades include removing and replacing the existing floor and window units, installing new systems in the corridors, and repairing components that will be affected

¹ City of Los Angeles. ZIMAS. Available at: <http://zimas.lacity.org>. Accessed June 22, 2017

² United States Department of Justice. The Americans with Disabilities Act of 1990 and Revised Regulations Implementing Title II and Title III. https://www.ada.gov/2010_regs.htm

333 South Beaudry Avenue, 21st 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*

PLACE
"FILED"
STICKER
HERE

by the HVAC replacement work.

The ADA compliance improvements are legal requirements mandated by the Division of State Architect (DSA) and include ADA path of travel upgrades, including exterior accessible gate and parking, ramps, landing cross slopes, ramp handrails, interior student and staff restroom, drinking fountain, and elevator upgrades. The Project includes the placement of temporary portable classroom units (portable classrooms) that will provide interim educational space for students that are displaced during Project construction.

No increases in enrollment, capacity or intensity of use are proposed as part of this Project. The Project will be implemented pursuant to all District Standards and Specifications, as well as all applicable State, federal, and local regulations, including DSA review and approval of design drawings and those Standard Conditions provided in LAUSD's Program Environmental Impact Report for the School Upgrade Program (Program EIR).³ The beneficiaries of the Project include Aragon Elementary School 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).

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 15268⁴]:
- 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 15311 – Accessory Structures*
 - *CEQA Guidelines Section 15314 – Minor Additions to Schools*
 - *CEQA Guidelines Section 15331 – Historical Resource Restoration/Rehabilitation*
- 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 scope of the Project entails completing seismic and HVAC upgrades, and implementing ADA compliance improvements at an existing campus. The seismic upgrades include shear wall (in-plane and out-of-plane) strengthening, wall pier flexural strengthening, coupling beam strengthening, diaphragm strengthening, wall anchorage

³ LAUSD. 2015. School Upgrade Program Final Environmental Impact Report, <http://achieve.lausd.net/ceqa>. Adopted by the Board of Education on November 10, 2015

⁴ CEQA Guidelines can be found at California Code of Regulations Title 14, Chapter 3, Section 15000 – Section 15387.

and cross tie strengthening, and foundation dowel strengthening. The ADA compliance improvements include path of travel upgrades, including exterior accessible gate and parking, ramps, landing cross slopes, ramp handrails, interior student and staff restrooms, drinking fountain, and elevator upgrades. These improvements constitute minor alterations to existing public facilities. The Project will not result in the physical expansion of school facilities and will not increase the intensity of use, nor will it increase student or staff capacity. Therefore, the Project satisfies 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 ADA compliance improvements include upgrades to existing structures and facilities with no change in purpose of use and negligible or no expansion of capacity. Therefore, the Project satisfies the requirements of CEQA Guidelines Section 15302.

Section 15311 Accessory Structures

Class 11 consists of construction or placement 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.

The ADA compliance improvements include path of travel upgrades, including exterior accessible gate and parking, ramps, landing cross slopes, ramp handrails, interior student and staff restrooms, drinking fountain, and elevator upgrades, and installation of ADA compliant signage on an existing campus. The ADA compliance improvements are legal requirements mandated by the DSA. Therefore, the Project satisfies the requirements of CEQA Guidelines Section 15311.

Section 15314 – Minor Additions to Schools

Class 14 consists of minor additions to existing schools within existing school grounds where the addition does not increase original student capacity by more than 25% or ten classrooms, whichever is less.

The Project consists of the installation of temporary portable classrooms on an existing school campus. In accordance with CEQA Guidelines Section 15314, the addition of a portable building is included in this exemption. The portable classrooms are temporary minor additions which will house displaced students on an existing campus and will be removed following completion of the Main Building Seismic Retrofit project. Additionally, the Project is not intended or expected to result in an increase in the student population or campus capacity. Therefore, the Project satisfies the requirements of CEQA Guidelines Section 15314.

Section 15331 – Historical Resource Restoration/Rehabilitation

Class 31 consists of projects limited to maintenance, repair, stabilization, rehabilitation, restoration, preservation, conservation, or reconstruction of historical resources in a manner consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings.

Aragon Elementary School has been determined to be a historical resource as defined by CEQA. The Project entails improvements to the Main Building, which are intended to provide seismic stabilization and will be done in a manner consistent with the Secretary of the Interior's Standards. Therefore, the Project satisfies the requirements of CEQA Guidelines Section 15331.

PLACE
"FILED"
STICKER
HERE

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 described below.

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

The Project is located on a fully developed, existing school site within a highly urbanized community. The Campus has not been designated as a biologically sensitive location.^{5,6} The nearest Federal Critical habitat is for Coastal California gnatcatcher (*Poloptila californica californica*), located approximately 8.5 miles southeast of the Campus in the Whittier Narrows Recreation Area.⁷ There is no suitable habitat for this species located within or immediately adjacent to the Campus. No impacts to listed species or their habitat is expected to occur as a result of this Project.

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

As an active school site, the Campus is subject to routine maintenance and operational activities. There are no known projects of the same type and magnitude that would occur on the Campus at this time. Therefore, no cumulative impacts would occur as a result of the Project.

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

There are no known unusual circumstances that would have a significant effect on the environment. Some minor ground-disturbing activities associated with the Project may occur. 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 excavated soil associated with earthwork activities for the Project. Excavated soil will only be reused onsite if it is placed beneath paved areas. If construction or earthmoving activities require import or export of soils and materials, the Office of Environmental Health & Safety (OEHS) must be notified to provide oversight to ensure that these activities are conducted in compliance with the requirements of District Specification 01 4524⁸ and applicable environmental agency rules and requirements. Furthermore, as set forth in standard conditions of approval SC-CUL-13, SC-CUL-15, SC-CUL-18, and SC-CUL-19⁹ 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. Construction and demolition waste will be recycled to the maximum extent feasible per SC-USS-1 of the Program EIR.¹⁰ 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 scenic highway;*

⁵ City of Los Angeles, Planning Department, *Zoning and Information Management System*, <http://zimas.lacity.org/>, accessed June 22, 2017.

⁶ Department of Regional Planning, Significant Ecological Areas. http://planning.lacounty.gov/assets/upl/project/gp_2035_2014-FIG_9-3_significant_ecological_areas.pdf. Accessed June 22, 2017.

⁷ United States Fish and Wildlife Service Critical Habitat Portal. Accessed June 22, 2017.

⁸ http://www.laschools.org/documents/file?file_id=219798234&show_all_versions_p=t

⁹ LAUSD OEHS, "School Upgrade Program Final Environmental Impact Report," <http://achieve.lausd.net/ceqa>. Adopted by the Board of Education on November 10, 2015.

¹⁰ *Ibid.*

PLACE
"FILED"
STICKER
HERE

The closest designated scenic highway to the Project is State Route 2. The Campus is located more than 8 miles south of State Route 2,¹¹ which is a sufficient distance from this resource to be outside of the view shed. As such, the Project would not degrade the characteristics that contribute to its scenic eligibility. 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*

The Campus is not included on any list compiled pursuant to Section 65962.5 of the Government Code.¹² Therefore, the Project will not be expected to result in impacts 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.*

Originally constructed in 1925, the Aragon Elementary School Main Building meets the age criteria for evaluation as an historic resource pursuant to CEQA. The Campus was evaluated as part of a historic resources survey conducted in 2002¹³ and was assigned a California Historical Resource Status Code of 5S3, which indicates that the property appears eligible for local listing or designation through survey evaluation. A reconnaissance level survey was conducted in 2016 by the OEHS' Historic Preservation Specialist which confirmed the previous finding that the Main Building is eligible for the California Register of Historic Places.¹⁴

In accordance with CEQA Guidelines Section 15064.5(b)(3), a project that has been determined to conform with the *Secretary's Standards*¹⁵ is generally considered to be a project that will not cause a significant adverse impact and material impairment (14 CCR Section 15126.4(b)(1)). If a project meets the *Secretary's Standards*, the project can, in most cases, be considered categorically exempt from CEQA (14 CCR Section 15331) and qualify for a Notice of Exemption.

A *Secretary's Standards* conformance review was completed by OEHS' Historic Preservation Specialist to ensure compliance with applicable guidelines (the *Secretary's Standards* and *Los Angeles Unified School District Design Guidelines and Treatment Approaches for Historic Schools*). The results of this analysis indicate that the Project conforms with the *Secretary's Standards*.¹⁶ Therefore, the Project satisfies the requirements specified in CEQA Guidelines Section 15064.5(b)(3), will not be expected to materially impair the significance of a historic resource, and will not be expected to result in an impact to the environment.

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

¹¹ http://www.dot.ca.gov/hq/LandArch/scenic_highways/index.htm. October 9, 2009

¹² California, State of, *Department of Toxic Substances Control, Envirostor Database*, <http://www.envirostor.dtsc.ca.gov/public/search.asp>, accessed June 22 2017.

¹³ Los Angeles Unified School District, *Final Memo, Historic Schools in LAUSD*, by Leslie Heumann and Associates, July 14, 2004.

¹⁴ Los Angeles unified School District. Historic Resources Inventory Database. Accessed June 22, 2017.

¹⁵ National Park Service, Department of the Interior, Washington DC. 1995. *Secretary of the Interior's (SOI) Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring and Reconstructing Historic Buildings*. Available at: <http://www.nps.gov/tps/standards/rehabilitation/rehabilitation-guidelines.pdf>

¹⁶ LAUSD Office of Environmental Health and Safety. 2017. *Secretary of the Interior's Standards Review. Aragon Elementary School, 1118 Aragon Avenue, Aragon Seismic Upgrades to Main Building (#10368731)*.

PLACE
"FILED"
STICKER
HERE

Prepared By:

Linda Wilde
CEQA Project Manager/Contract Professional

Signed by:



Robert Laughton,
CEQA Officer of the Los Angeles Unified School District

Phone and Email:

(213) 241-4821
Linda.Wilde@LAUSD.net

Date:

12/21/17