

Los Angeles Unified School District

Office of Environmental Health and Safety

VIVIAN EKCHIAN
Interim Superintendent of Schools

ORIGINAL FILED

FEB 26 2018

LOS ANGELES, COUNTY CLERK

DIANE PAPPAS.
CEO, District Operations & Digital Innovations

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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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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:

Portable Removal and Replacement Project

Project Location – Specific:

The Portable Removal and Replacement Project (Project) will be located on the following Los Angeles Unified School District (LAUSD) campuses:

Canyon Charter Elementary School (421 Entrada Drive, Santa Monica 90402)
Castle Heights Elementary School (9755 Cattaraugus Avenue, Los Angeles 90034)

Project Location – City:

Santa Monica, Los Angeles

Project Location – County:

Los Angeles

Description of Nature, Purpose, and Beneficiaries of Project:

The scope of the Project includes the replacement of temporary portable buildings with permanent facilities. Specifically, the Project will include the removal of four portable buildings containing seven classrooms and one permanent building with two kindergarten classrooms at Canyon Charter Elementary School (Canyon ES) and the removal of five portable buildings containing eight classrooms at Castle Heights Elementary School (Castle Heights ES). The portable buildings will be replaced with the construction of a new building with nine classrooms (three kindergarten and six general) and support spaces at Canyon ES; and a new two-story building with nine classrooms and support spaces at Castle Heights ES.

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.*

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The Project will also include infrastructure upgrades to support the new facilities, including expanded parking at Canyon ES; installation of temporary interim classrooms for swing space; Americans with Disabilities Act (ADA)¹ compliance components to provide access to the new facilities; and restoration of landscape, hardscape, and playground areas where the portable buildings will be removed. The ADA compliance improvements are legal requirements mandated by the California Building Code Standard via the Division of State Architect (DSA) and include path of travel and accessibility upgrades.

Negligible increases in enrollment, capacity, or intensity of use are proposed as part of this Project. 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),² which was completed in compliance with the California Environmental Quality Act (CEQA), and the Americans with Disabilities Act (ADA) compliance. LAUSD's standard conditions, guidelines, and 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 the Project include Canyon ES and Castle Heights 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).

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 15268³]:
- 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*
 - *CEQA Guidelines Section 15311 – Accessory Structures*
 - *CEQA Guidelines Section 15314 – Minor Additions to Schools*
- 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.

¹ 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

² LAUSD. 2015. School Upgrade Program Final Environmental Impact Report, <http://achieve.lausd.net/ceqa>. Adopted by the Board of Education on November 10, 2015.

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

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The Project includes campus-wide infrastructure upgrades, ADA compliance improvements, and restoration of landscape, hardscape, and playground areas at existing campuses. Specifically, ADA improvements include accessible path of travel associated with the upgrades, including an elevator at Castle Heights ES, will result in a negligible physical expansion of school facilities and will not significantly increase the intensity of use or 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 Project will replace existing classrooms in portable buildings with new classrooms in permanent buildings. The new permanent buildings will be located in the same site and have substantially the same purpose and capacity as the portable buildings being replaced. 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 campus-wide ADA compliance components of the Project include the construction or replacement of minor structures accessory to existing school facilities, including path of travel and accessibility upgrades. These components of the Project qualify as construction or replacement of minor structures accessory to existing school facilities. 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 addition of portable classrooms is included in this exemption.

The Project will replace classrooms in portable buildings with classrooms in permanent buildings and will not increase student capacity or net increase in the number of classrooms by more than 25% or ten classrooms. The Project also includes the placement of interim portable classrooms during construction of the permanent classrooms. The interim classrooms will be used to offset the classrooms not available for use during construction. The interim classrooms will be removed once construction is complete and will not permanently increase the student capacity or the number of classrooms. Therefore, the Project fulfills the requirements for a Class 14 Categorical Exemption.

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 nearest sensitive environments to the Project sites are Federally designated critical habitat and Significant Ecological Areas. The table below shows the distances of the Project sites to the nearest sensitive environments. The campuses are fully developed, existing school sites within highly urbanized communities. The Project sites have not been designated as biologically sensitive locations and the Project would not require the removal of any biologically sensitive uses.

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Distance of Each School to the Nearest Sensitive Environment

School	Distance to the Nearest Sensitive Environment	Description of Sensitive Environment
Canyon Charter Elementary School	0.46 miles	Critical habitat for Western snowy plover
Castle Heights Elementary School	6.6 miles	Critical habitat for Western snowy plover

Notes: The distances from the schools to the nearest sensitive environments were measured using interactive maps provided by the USFWS and LA County (United States Fish and Wildlife Service Critical Habitat Portal, <https://ecos.fws.gov/ecp/report/table/critical-habitat.html> accessed January 12, 2018 and Los Angeles County Department of Regional Planning, http://gis.planning.lacounty.gov/GIS-NET3_Public/Viewer.html, accessed January 12, 2018).

If the Project includes 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 protected native species. If tree removal or trimming is scheduled to occur between February 1 and August 31, a nesting bird survey would be performed prior to removal activities, per Standard Condition of approval SC-BIO-3 of the Program EIR.⁴ 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;*

LAUSD has portable replacement projects at other LAUSD campuses. While there will be successive projects of the same type, they will not occur at the Canyon ES or Castle Heights ES campuses. Therefore, there will be no cumulative impacts because of successive projects of the same type occurring 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. Some minor ground-disturbing activities associated with the Project will 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 soils associated with earthwork activities for the Project. Excavated soils will only be reused onsite if they are placed beneath paved areas. If construction or earthmoving activities require import or export of soils and materials, the OEHS must be notified to provide oversight to ensure that these activities are conducted in compliance with the requirements of District Specification 01 4524,⁵ relevant provisions of South Coast Air Quality Management District Rule 1466, and other applicable environmental agency rules and requirements. Furthermore, as set forth in LAUSD's Standard Conditions of Approval (SC) SC-CUL-13, SC-CUL-15, SC-CUL-18, and SC-CUL-19⁶ 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

⁴ LAUSD OEHS, "School Upgrade Program Final Environmental Impact Report," <http://achieve.lausd.net/ceqa>, Adopted by the Board of Education on November 10, 2015.

⁵ http://www.laschools.org/documents/file?file_id=219798234&show_all_versions_p=t

⁶ 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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demolition waste shall be recycled to the maximum extent feasible per SC-USS-1 of the Program EIR.⁷ 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;*

The closest designated scenic highway to the Project is the State Route 2, located approximately 16.5 miles northeast of Castle Heights ES, which is the closer of the two schools.⁸ This is a sufficient distance from this resource to be outside of the view shed, so the Project will 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 Project will occur on existing school campuses that are not included on any list compiled pursuant to Section 65962.5 of the Government Code.⁹ 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 historic resource.*

Both schools are over 45-years old, meeting the age criterion for consideration as an historic resource under CEQA guidelines. A District survey found Canyon ES to be ineligible for listing in the National Register of Historic Places and the California Register of Historic Resources.¹⁰ While District surveys found Castle Heights ES to be ineligible, SurveyLA found the campus eligible for listing in California Register of Historic Resources as an excellent example of a postwar, indoor-outdoor LAUSD campus.¹¹

Therefore, the Project at Castle Heights ES shall follow the *Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings*, the *Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (Secretary's Standards)* and *Los Angeles Unified School District Design Guidelines and Treatment Approaches for Historic Schools (LAUSD Design Guidelines)*.^{12,13,14} The Project will avoid removing, destroying, or obstructing any historic character-defining features, shall use the least invasive methods for all work involving character-defining features, and shall ensure that any new additions, materials, or features are compatible with the historic character of the school. To ensure that the Project follows the *Secretary's Standards* and *LAUSD Design Guidelines*, and avoids adverse impacts to the historic district, the following considerations will guide the design of new construction; infrastructure upgrades; ADA compliance components; and restoration of landscape, hardscape, and playgrounds.

⁷ *Ibid.*

⁸ http://www.dot.ca.gov/hq/LandArch/scenic_highways/index.htm. October 9, 2009

⁹ California, State of, Department of Toxic Substances Control, Envirostor Database, <http://www.envirostor.dtsc.ca.gov/public/search.asp>, accessed January 12, 2018.

¹⁰ LAUSD OEHS. 2017. LAUSD Historic Resource Inventory Database.

¹¹ LAUSD OEHS. 2017. LAUSD Historic Resource Inventory Database.

¹² National Park Service, Department of the Interior, Washington, D.C. 1995. "The Secretary of the Interior's Standards for Rehabilitation, with Guidelines for Rehabilitating, Preserving, Restoring, and Reconstructing Historic Buildings."

¹³ National Park Service, Department of the Interior, Washington DC. 1997. *Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings*. Available at: <https://www.nps.gov/tps/standards/rehabilitation/rehabilitation-guidelines.pdf>

¹⁴ LAUSD OEHS, 2015. "Los Angeles Unified School District Design Guidelines and Treatment Approaches for Historic Schools."

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- The Design-Build team will include a Historic Architect meeting the professional qualifications standards described in the *LAUSD Design Guidelines*.¹⁵
- All work will follow the *LAUSD Design Guidelines* and the *Secretary's Standards*.¹⁶
- The Historic Architect will identify and provide to the Design-Build team options for meeting the above-mentioned guidelines. The focus of the Historic Architect's work will be (1) identifying design options, with respect to mass/scale, siting, and architectural character, that will retain and reinforce character-defining features of the historic district and its contributing features, and (2) ensuring that ADA compliance components, and restoration of landscape, hardscape, and playgrounds follow the applicable historic preservation guidelines and standards.
- The Historic Architect will identify design options for ensuring that (1) new construction meets the Project needs and is compatible but differentiated from the surrounding historic resources and that (2) infrastructure upgrades; ADA components; and restoration of landscape, hardscape, and playgrounds are carried out in a way that retains and protects character-defining features.
- The Historic Architect will provide a brief written memo, on a template to be provided by LAUSD, describing how principal Project components conform with the *Secretary's Standards* and above-mentioned guidelines.
- The Project will be subject to internal review by OEHS at the schematic, 50 percent/design development phase, and 100 percent construction drawings phase to ensure ongoing compliance with the *Secretary's Standards* and applicable guidelines.

In accordance with CEQA Guidelines Section 15064.5(b)(3), a project that conforms with the *Secretary's Standards* 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. The work shall conform with the *Secretary's Standards* and the *LAUSD Design Guidelines*, therefore the Project meets the requirements specified in CEQA Guidelines Section 15064.5(b)(3), will not materially impair the significance of a historic resource, and will not result in an impact to the environment.

Should the scope of the Project 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* a would not cause a substantial adverse change in the significance of a historic resource.

¹⁵ *Ibid.*

¹⁶ National Park Service, Department of the Interior, Washington, D.C. 1995. "The Secretary of the Interior's Standards for Rehabilitation, with Guidelines for Rehabilitating, Preserving, Restoring, and Reconstructing Historic Buildings."

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Prepared By:

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Signed by:



Robert Laughton
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Date:

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BUSINESS FILINGS REGISTRATION
NORWALK DEPARTMENT HEADQUARTER

Cashier: L. MCCOY



Monday, February 26, 2018 3:03 PM

<u>Item(s)</u>	<u>qty</u>	<u>Total</u>
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NOE - County Posting Fee	1	\$75.00
2018047645		
NOE - County Posting Fee	1	\$75.00
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NOE - County Posting Fee	1	\$75.00
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NOE - County Posting Fee	1	\$75.00
2018047648		

Total **\$300.00**

Total Documents: 4

Customer payment(s):

Check \$300.00

Check List:

#53622	\$75.00
#53623	\$75.00
#53624	\$75.00
#53606	\$75.00