

# Los Angeles Unified School District

## Office of Environmental Health and Safety

MICHELLE KING  
Superintendent of Schools

THELMA MELÉNDEZ, PH.D.  
Chief Executive Officer, Office of Educational Services

ROBERT LAUGHTON  
Director, Environmental Health and Safety

CARLOS A. TORRES  
Deputy Director, Environmental Health and Safety

### NOTICE OF EXEMPTION

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**ORIGINAL FILED**

**FEB 16 2018**

**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:**

Drew Middle School Wellness Center

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**Project Location – Specific:**

The Drew Middle School Wellness Center (Project) will be located on the 19.8-acre Charles Drew Junior High School (Drew Middle School) campus. Drew Middle School is located at 8511 Compton Avenue in the unincorporated Florence-Firestone community, County of Los Angeles, CA. The campus is bound by Compton Avenue to the east; Firestone Boulevard, residences along either side of Zamora Avenue, and Russell Elementary School to the south; residences to the west; and residences located south of East 83<sup>rd</sup> Street to the north. The Project will occur in the southern portion of the campus.

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**Project Location – City:**

Unincorporated (Florence-Firestone)

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**Project Location – County:**

Los Angeles

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

The Project will entail constructing and operating a new wellness center on the southern portion of the campus. The wellness center will be a free-standing, approximately 3,600 square-foot (sq ft), one-story, permanent building that would be constructed in a grass area that contains several ornamental trees. The surrounding area will be improved to provide landscaping and frontage to the wellness center and on-site parking.

The Project is designed to provide health care access for students, their families, and the community. Specifically, the Project will provide free and low-cost comprehensive medical, behavioral, and dental services to students, families, and the community.

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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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Construction of the Project will be complete within approximately 18 months once the design is approved. No increases in student enrollment or campus growth are proposed as part of this Project.

The Project will be constructed per Division of State Architect approved design specifications, including Americans with Disabilities Act (ADA) compliance. 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> which was completed in compliance with the California Environmental Quality Act (CEQA). The beneficiaries of this Project include the District's students and staff as well as families, school supporters and the community at large who may be served by the wellness center.

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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 15303 – New Construction or Conversion of Small 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.

The Project will entail site improvements and minor alterations such as: the installation of landscaping and the creation of parking on an existing middle school campus. The Project will not require or result in the growth of enrollment or capacity of the student population or campus. The Project is not designed to increase student enrollment. The Project will be constructed completely within the boundaries of the existing campus and will not require or result in the expansion of use beyond the campus. The Project will be constructed in an area on the campus that does not contain any buildings or structures. The remaining campus will not be adversely impacted or altered as a result of the Project. Therefore, the Project satisfies the requirements of CEQA Guidelines Section 15301.

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<sup>1</sup> LAUSD. 2015. 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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### 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 in the exterior of the structure.

As previously noted, the Project entails constructing one new 3,600 sq ft building, upgrades, and retrofitting a portion of an existing campus. The Project is designed to provide health care access for students, their families, and the community. Specifically, the Project will provide free and low-cost comprehensive medical, behavioral, and dental services to students, families, and the community. The new building will require installation and connection of new utilities to the existing facilities for the campus. The existing permanent buildings on the campus will not be altered or modified as a part of the Project. Therefore, the Project satisfies the requirements of CEQA Guidelines Section 15303.

### Section 15314 – Minor Addition 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 entails construction of a new 3,600 sq ft building and improvements to a portion of an existing campus. The Project is not designed to increase the student enrollment or capacity and does not include the addition of any new classrooms (or the commiserate space that would be associated with 10 classrooms, 9,600 sq ft). Therefore, the Project satisfies the requirements of CEQA Guidelines Section 15314.

### 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-residential setting. The surrounding uses are primarily residential with single and multi-family homes and commercial uses.<sup>3</sup> Neither the campus nor the surrounding area have been designated as a biologically sensitive site or location and the campus does not contain sensitive resources or habitat that will be impacted by the Project.<sup>4</sup> The nearest critical habitat is designated for the coastal California gnatcatcher and is located approximately 10 miles northeast of the campus.<sup>5</sup> As such, the Project will not have the potential to impact any 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 routine maintenance activities or upgrades will occur on the

<sup>3</sup> City of Los Angeles. ZIMAS. Available at: <http://zimas.lacity.org/>. Accessed March 2017.

<sup>4</sup> US Fish and Wildlife Service. FWS Maps. Available at: <https://ecos.fws.gov/>. Accessed March 2017.

<sup>5</sup> Ibid.

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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 is not expected to result in 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 associated with the Project that will have a significant effect on the environment. The Project will require minor ground disturbance and soil excavation associated with construction of the new building, installation of utility lines, and replacing asphalt. Therefore, consideration must be given to the management of excavated soil. LAUSD will prepare a Preliminary Environmental Assessment-Equivalent (PEA-E) and complete soil sampling for chemicals of potential concern: lead, arsenic, and organochlorine pesticides (OCPs). Construction or earthmoving activities that require import or export of soils and materials will require oversight by LAUSD's Office of Environmental Health & Safety (OEHS) to ensure that these activities are conducted in compliance with the requirements of District Specification 01 4524 and the applicable environmental agency rules and requirements.<sup>6</sup>

LAUSD will ensure that all construction related activities comply with the applicable LAUSD Standard Conditions of Approval (SCs) which include but are not limited to:<sup>7</sup> SC-USS-1, which requires that any construction waste will be recycled to the maximum extent feasible.<sup>8</sup> Furthermore, as set forth in SC-CUL-13, SC-CUL-15, SC-CUL-18 and SC-CUL-19 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>9</sup> Therefore, no reasonable possibility exists that the Project will 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 Drew Middle School campus is located approximately 18 miles south of State Route 2 (SR 2), the officially designated State scenic highway.<sup>10</sup> The Project would 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.

<sup>6</sup> LAUSD. District Specification 01 4524 Reference. Available at: [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. 2015. School Upgrade Program Final Environmental Impact Report, <http://achieve.lausd.net/ceqa>. Adopted by the Board of Education on November 10, 2015.

<sup>8</sup> Ibid.

<sup>9</sup> Ibid.

<sup>10</sup> California Department of Transportation. California Scenic Highway Mapping System. Available at: [http://www.dot.ca.gov/hq/LandArch/16\\_livability/scenic\\_highways/index.htm](http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/index.htm). Accessed March 2017.

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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.*

Drew Middle School was built in the 1960s and opened in 1963.<sup>12</sup> The earliest building was constructed in 1962 and the campus retains all of its initial permanent buildings which were all constructed in the 1960s.<sup>13</sup> The entire Drew Middle School is eligible for listing in the National Register under criterion C and the California Register under criterion 3 and LAUSD considers it a historical resource for the purposes of CEQA.<sup>14</sup>

The new construction will occur in the southern portion of the campus off Firestone Boulevard, west of the Industrial Arts Building (1963) and south of the Agricultural Unit and Lath House (1963). However, the new construction is located away from campus core and will not be visible from the primary elevation of the existing structures or from the central lawn.<sup>15</sup> As such, while the design of the new construction should be sensitive to the historical nature of the existing campus, the Design-Build team is not required to include a qualified historic architect on the design team. The Project will not have the potential to impact the historic resource. Specifically, and consistent with the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings, the Project will not have elements that will destroy historic materials that characterize the property; the new building will be compatible with the campus in massing, scale, and size; and the new building will be located and constructed in such a manner that if removed in the future, the historic property and its environment will be unimpaired.

Therefore, the Project does not entail components that will adversely impact the historic significance of the campus and the Project does not have the potential to cause a substantial adverse change to a historic resource.

Prepared By:

Eimon Smith  
CEQA Project Manager/Contract Professional

Signed by:

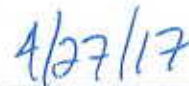


Robert Laughton  
CEQA Officer of the Los Angeles Unified School District

Phone and Email:

(213) 241-3417  
Eimon.Smith@LAUSD.net

Date:



<sup>11</sup> California Department of Toxic Substances Control. DTSC Databases. Available at: <http://www.dtsc.ca.gov/database/>. Accessed March 2017.

<sup>12</sup> LAUSD. Facilities Services Division. Available at: <http://www.laschools.org/new-site/>. Accessed March 2017.

<sup>13</sup> Ibid.

<sup>14</sup> LAUSD. PCR Services Corporation, Historical Resources Assessment Report: Charles C. Drew Junior High School [sic], September 2014.

<sup>15</sup> LAUSD. Wellness Center email correspondence from Debi Howell-Ardilla (February 2, 2017).