

# Los Angeles Unified School District

## Office of Environmental Health and Safety

AUSTIN BEUTNER  
Superintendent of Schools

VIVIAN EKCHIAN  
Deputy Superintendent

CARLOS A. TORRES  
Director, Environmental Health and Safety

JENNIFER FLORES  
Deputy Director, Environmental Health and Safety

### NOTICE OF EXEMPTION

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**ORIGINAL FILED**

JUN 06 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:**

East Los Angeles Occupational Center Paving Project

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**Project Location – Specific:**

The East Los Angeles Occupational Center Paving Project (Project) will occur on the 9.14-acre East Los Angeles Occupational Center campus (Campus). The Campus is located at 2100 Marengo Street in the City of Los Angeles. The Campus is located in an urbanized community primarily consisting of commercial uses, multi-family and single-family residences.

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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 80,000 square feet of asphalt paving in the parking areas and in between buildings. The Project will also provide upgrades to restrooms, drinking fountains, parking, and Path of Travel improvements in accordance with the Americans with Disabilities Act (ADA). 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 OEHS, "Standard Conditions of Approval for District Construction, Upgrade, and Improvements Projects," Adopted by the Board of Education on February 5, 2019.

Doc# 693426

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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 East Los Angeles Occupational Center (ELAOC) 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 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*
  -
- 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 replace approximately 80,000 square feet of asphalt paving in the parking areas and in between buildings. The Project will also provide upgrades to restrooms, drinking fountains, parking, and Path of Travel improvements in accordance with the Americans with Disabilities Act (ADA). Replacement of these facilities will not present a new or expanded use of the 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.

Consistent with Section 15302(a) of the CEQA Guidelines, the Project will replace approximately 80,000 square feet of asphalt paving in the parking areas and in between buildings. The Project will also provide upgrades to restrooms, drinking fountains, parking, and Path of Travel improvements in accordance with the Americans with Disabilities Act (ADA). The Project will not result in an increase or alteration of the current use, function, or capacity of the existing facilities or Campus.

<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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The replacement facilities and upgraded fixtures will serve the same purpose and capacity as the existing facilities that are being replaced. Therefore, the Project fulfills the requirements of CEQA Guidelines Section 15302.

### 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 will be located on a fully developed campus. The Campus has not been designated as a sensitive or biological site and no sensitive or biological resources have been identified on the Campus that will be impacted by the Project.<sup>3</sup> The Project will consist of in-kind construction to previously disturbed areas on an existing campus that is not on or within the immediate proximity of any sensitive environment. The nearest significant ecological area (SEA) consist of critical habitat designated for the Coastal California gnatcatcher, located approximately 6.9 miles east of the Project site.<sup>4</sup> These improvements will not require alterations, removal, destruction or any other form of impact to any sensitive or biological resources. Therefore, the Project will not have the potential to adversely impact sensitive or biological resources.

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

Currently, there are no other successive projects of the same type planned at the Campus during the same construction period.<sup>5</sup> All known activities that will occur on the Campus during the same construction period have been discussed in the project description. The Project will not have the potential to result in significant impacts that will be considered cumulatively considerable. Therefore, no cumulative impacts will be expected to result from the modifications, upgrades, and improvements associated with 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. 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. The Project involves the removal of decomposed granite, asphalt, and pavement, which requires soil sampling and testing for characterization prior to removal. Excavated soils will only be reused onsite if they are placed beneath paved areas. 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 SC-CUL-7, SC-CUL-9, SC-CUL-10, and SC-CUL-11 and in District protocols, construction activities must be stopped immediately and OEHS notified upon

<sup>3</sup> City of Los Angeles. ZIMAS. Available at: <http://zimas.lacity.org>. Accessed April 2019.

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

<sup>5</sup> LAUSD. Facilities Services Division, Facilities Initiatives. Available at: <http://mo.laschools.org/fis/existing-facilities/m-and-o/ef-projects/project-segments?locn=8557>. Accessed April 2019.

<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)

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discovery of subsurface features, such as buried resources (i.e., paleontological resources, archaeological resources), tanks or seepage pits, or stained/odoriferous soils.<sup>7</sup> Lastly, any construction and demolition waste shall be recycled to the maximum extent feasible per SC-USS-1.<sup>8</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 11.9 miles south of State Route 2 (SR 2), the nearest officially designated State scenic highway.<sup>9</sup> The Campus is not visible from SR2 and the Project does not involve alterations to the Campus that would have the potential to damage scenic resources. Therefore, the Project will not be expected to 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 associated with the Project is not included on any list compiled pursuant to Section 65962.5 of the Government Code.<sup>10</sup> 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.*

LAUSD's Historic Preservation Specialist determined that ELAOC is ineligible as a historic resource.<sup>11</sup> The campus consists of functional buildings with no architectural features associated with a particular style. Research did not reveal any significant association between the Campus and the development of alternative educational approaches or any other historical events or personages significant to national, state, or local history. Therefore, the Project would have no impact to a historic resource.

Prepared By:

Phone and Email:

<sup>7</sup> *Ibid.*

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

<sup>9</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 April 2019.

<sup>10</sup> California Department of Toxic Substances Control. DTSC Databases. Available at: <http://www.dtsc.ca.gov/database/index.cfm>. Accessed April 2019.

<sup>11</sup> LAUSD OEHS, "East Los Angeles Occupational Center DPR 523L Continuation Sheet" May 2019.

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Christy Wong  
Assistant CEQA Project Manager/Contract Professional

(213) 241-3394  
cp-christy.wong@LAUSD.net

Signed by:



Date:

5/10/2019

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