

Los Angeles Unified School District

Office of Environmental Health and Safety

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JUL 05 2018

LOS ANGELES, COUNTY CLERK 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 S. Beaudry Avenue
21st Floor
Los Angeles, CA 90017

Project Title:

Americans with Disabilities Act (ADA) Compliance Projects at seven LAUSD Campuses (Groups 6 and 7)

Project Location – Specific:

- 107th Street Elementary School - 147 E 107th St, Los Angeles, CA 90003
- 54th Street Elementary School - 5501 S Eileen Ave, Los Angeles, CA 90043
- George Washington Carver Middle School - 4410 McKinley Ave., Los Angeles, CA 90011
- Fairfax High School - 7850 Melrose Ave, Los Angeles, CA 90046
- Morris K. Hamasaki Elementary School - 4865 E 1st St, Los Angeles, CA 90022
- Patrick Henry Middle School - 17340 San Jose Street Granada Hills, CA 91344
- Paul Revere Middle School - 1450 Allenford Ave, Los Angeles, CA 90049

Project Location – City:

Various (see above)

Project Location – County:

Los Angeles

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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 seven Los Angeles Unified School District (LAUSD) school campuses: 107th Street Elementary School (ES), 54th Street ES, George Washington Carver Middle School (MS), Fairfax High School (HS), Morris K. Hamasaki ES, Patrick Henry MS, and Paul Revere 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 the removal of barriers; ADA upgrades to existing restrooms to improve accessibility and install ADA compliant fixtures; installation of ADA ramps; installation of platform lifts; modifications to arcades; installation of ADA compliant drinking fountains and sinks; installation of accessible gates, doors, thresholds, handrails, and/or hardware; modifications to cafeteria counters; installation of ADA compliant signage; creation of accessible parking stalls and loading zones through re-striping; assembly seating modifications; modifications to locker rooms, nurse's examination rooms, and dressing rooms; accessible furniture installation or upgrades; new elevators; modification to, or new, railings; and installation of new assistive listening devices, intercoms, and or phones. The table below summarizes the various ADA compliance improvements that would occur at each school.

Summary of Proposed ADA Compliance Improvements at Each School

School	Accessible Route Upgrades and Barrier Removal	ADA Restroom Upgrades	ADA Compliant Ramps	Platform Lift Installation	Arcade Modifications	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	Accessible Furniture Installation	New Elevator	Railing Modifications	Assistive Listening Devices/Intercom/Phones
107 th Street ES	X	X	X		X	X	X		X	X	X	X	X		X	X
54 th Street ES	X	X	X	X		X	X		X		X	X	X	X	X	X
Carver MS	X	X				X	X		X	X	X	X	X	X	X	X
Fairfax HS	X	X	X	X		X	X	X	X	X	X	X	X		X	X
Hamasaki ES	X	X		X		X	X		X	X	X	X	X		X	X
Patrick Henry MS	X	X		X		X	X		X	X		X	X	X	X	X
Revere MS	X	X	X	X		X	X	X	X	X	X	X	X		X	X

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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).¹ 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 15268²]:
- 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:

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 to existing facilities at seven LAUSD campuses. Such improvements may include, but are not limited to; accessible route upgrades and the removal of barriers; ADA upgrades to existing restrooms to improve accessibility and install ADA compliant fixtures; installation of ADA compliant ramps; installation of platform lifts; modification to arcades; installation of ADA compliant drinking fountains and sinks; installation of accessible gates, doors, thresholds, handrails, and/or hardware; modifications to cafeteria counters; installation of ADA compliant signage; creation of accessible parking stalls and loading zones through re-striping; assembly seating modifications; modifications to locker rooms, nurse's examination rooms, and dressing rooms; accessible furniture installation or upgrades; new elevators; modification to, or new, railings; and installation of new assistive listening devices, intercoms, and or phones.

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

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

All of the proposed activities would occur within the area occupied by existing facilities at the Project sites. The Project would not require the addition or construction of any new or expanded facilities beyond the existing facilities. The improvements would not present a new or expanded use of the site. Therefore, the Project constitutes minor alterations to an existing school site 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 the removal of barriers; ADA upgrades to existing restrooms to improve accessibility and install ADA compliant fixtures; installation of ADA compliant ramps; installation of platform lifts; modifications to arcades; installation of ADA compliant drinking fountains and sinks; installation of accessible gates, doors, thresholds, handrails, and/or hardware; modifications to cafeteria counters; installation of ADA compliant signage; creation of accessible parking stalls and loading zones through re-striping; assembly seating modifications; modifications to locker rooms, nurse's examination rooms, and dressing rooms; accessible furniture installation or upgrades; new elevators; modification to, or new, railings; and installation of new assistive listening devices, intercoms, and or phones. 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 fixtures; 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 re-striping; and accessible furniture installation. 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.

The Project includes the construction or replacement of minor structures accessory to existing institutional facilities, including accessible route upgrades and the removal of barriers; installation of ADA compliant ramps; installation of platform lifts; installation of accessible gates; installation of ADA compliant signage; creation of accessible parking stalls and loading zones through re-striping; modifications to playground components; modifications to railings; accessible furniture installation or upgrades; and installation of 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.³ None of the Project sites have been designated as biologically sensitive locations. The nearest sensitive environment to the Project sites is a Critical Habitat area for the Coastal California gnatcatcher (*Poliophtila californica californica*) located approximately 3.4 miles west of Hamasaki ES.^{4,5} Additionally, the Project would not require the removal of any biologically sensitive uses. 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;*

As the Campuses are active school sites, 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, then 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.⁶ Compliance with the provisions of LAUSD's Program EIR and District policies would ensure that there is not a reasonable possibility that the Project would have a significant effect on the environment due to unforeseen circumstances.

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 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

³ City of Los Angeles Planning Department, *Zoning and Information Management System*, <http://zimas.lacity.org/>, accessed May 2018.

⁴ United States Fish and Wildlife Service Critical Habitat Portal, <https://ecos.fws.gov/ecp/report/table/critical-habitat.html> accessed May 2018.

⁵ Los Angeles County Department of Regional Planning, http://gis.planning.lacounty.gov/GIS-NET3_Public/Viewer.html, accessed May 2018.

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.

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.⁷

The proposed new project includes construction of elevators at 54th Street ES and Patrick Henry MS, which are both located in a high radon zone. Therefore, LAUSD will comply with local requirements for construction of an elevator within a high radon zone.

Furthermore, as set forth in standard conditions of approval 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.⁸ Lastly, any construction and demolition waste shall be recycled to the maximum extent feasible per standard condition of approval SC-USS-1 of the Program EIR.⁹ 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 any of the Project sites is State Route 2 (SR2), which is located approximately 11.6 miles north of Hamasaki ES.¹⁰ 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.¹¹ 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.*

All seven Project sites are over 45 years old, meeting LAUSD's threshold for review as potential historic resources and requiring evaluations for historic eligibility. LAUSD has identified all seven Campuses as eligible for listing as a historic resource per Section 18955 of the California State Historical Building Code (CHBC).¹²

The proposed work on the Campuses shall follow the *Secretary of the Interior's Standards for the Treatment of Historic Properties (Secretary's Standards)* and *Los Angeles Unified School District Design Guidelines and*

⁷ LAUSD OEHS, "Section 01 4524 Environmental Import/Export Materials Testing", http://www.laschools.org/documents/file?file_id=219798234&show_all_versions_p=t

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

⁹ *Ibid.*

¹⁰ Los Angeles County Department of Regional Planning, http://gis.planning.lacounty.gov/GIS-NET3_Public/Viewer.html, accessed May 2018.

¹¹ http://www.dtsc.ca.gov/SiteCleanup/Cortese_List.cfm, accessed May 2018.

¹² "California's State Historical Building Code," Sections 18950 to 18961 of Division 13, Part 2.7 of Health and Safety Code (H&SC). 2003.

Treatment Approaches for Historic Schools (LAUSD Design Guidelines).^{13,14} The work on the Campuses shall 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 work on the Campuses follows the *Secretary's Standards* and *LAUSD Design Guidelines* and avoids adverse impacts to historic resources, the following considerations will guide the design of the ADA compliance improvements.

- The Design 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
- Where a proposed intervention would result in an adverse effect, the Historic Architect will identify and provide to the Design-Build team options that would meet the above-mentioned standards and 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 sustain the significance of the character-defining features of the historical resource, and (2) ensure that the Project follows 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) the Project is 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's Historic Preservation Specialist 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. (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. As the Project shall conform with the *Secretary's Standards* and the *LAUSD Design Guidelines*, OEHS's 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* a would not cause a substantial adverse change in the significance of a historical resource.

¹³ National Park Service, Department of the Interior, Washington, D.C. 1995. "The Secretary of the Interior's Standards for the Treatment of Historic Properties."

¹⁴ LAUSD OEHS, 2015. "Los Angeles Unified School District Design Guidelines and Treatment Approaches for Historic Schools."¹⁹

¹⁵ Ibid.

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Signed by:



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

Date:

