

Los Angeles Unified School District

Office of Environmental Health and Safety

VIVIAN EKCHIAN
Interim Superintendent of Schools

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Chief Executive Officer
District Operations and Digital Innovation

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NOTICE OF EXEMPTION

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JUL 05 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 S. Beaudry Avenue
21st Floor
Los Angeles, CA 90017

Project Title:

Americans with Disabilities Act (ADA) Compliance Projects at nine LAUSD Campuses

Project Location – Specific:

- 3rd Street Elementary School – 201 South June Street, Los Angeles, CA 90004
- Carson High School – 22328 South Main Street, Carson, CA 90745
- Chapman Elementary School – 1947 Marine Avenue, Gardena, CA 90249
- Christopher Dena Elementary School – 1314 Dacotah Street, Los Angeles, CA 90023
- Eagle Rock High School – 1750 Yosemite Drive, Los Angeles, CA 90041
- Langdon Avenue Elementary School – 8817 Langdon Avenue, North Hills, CA 91343
- Normandie Avenue Elementary School – 4505 South Raymond Avenue, Los Angeles, CA, 90037
- Richland Avenue Elementary School – 11562 Richland Avenue, Los Angeles, CA 90064
- Westchester High School – 7400 West Manchester Avenue, Los Angeles, CA 90045

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 nine Los Angeles Unified School District (LAUSD) school campuses: 3rd Street Elementary School (ES), Carson High School (HS), Chapman ES, Christopher Dena ES, Eagle Rock HS, Langdon Avenue ES, Normandie Avenue ES, Richland Avenue ES, and Westchester HS (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: path of travel (POT) upgrades and the removal of barriers; 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, and/or hardware; modifications to cafeteria counters; installation of ADA compliant signage; creation of accessible parking stalls and loading zones through re-striping; modifications to assembly seating; modifications to locker rooms, nurse's examination rooms, and dressing rooms; modifications to furniture; installation of new elevators; modifications to, or installation of, railings; and installation of assistive listening devices, intercoms, 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	Path of Travel Upgrades	ADA Restroom Upgrades	ADA Ramps	ADA Lifts	Arcade Modifications	ADA Compliant Drinking Fountains and Sinks	Accessible Gates, Doors, Thresholds, &/or Hardware	Cafeteria Counter Modifications	ADA Compliant Signage	Accessible Parking Stalls/ Loading Zones	Assembly Seats Modifications	Locker Room, Nurse's Exam Room, Dressing Room Modifications	Furniture/Accessibility	New Elevator	Railings	Assistive Listening Devices/Intercom/Phones
3 rd Street ES	X	X	X	X		X	X		X	X	X		X			X
Carson HS	X	X	X	X		X	X	X	X	X	X	X	X	X	X	X
Chapman ES	X	X	X	X		X	X	X	X	X	X		X		X	X
Christopher Dena ES	X	X	X	X	X	X	X	X	X	X			X	X		X
Eagle Rock HS	X	X	X	X		X	X	X	X	X		X	X	X	X	X
Langdon ES	X	X	X			X	X		X	X	X	X	X	X	X	X
Normandie Avenue ES	X	X	X	X		X	X		X	X	X	X		X	X	X
Richland Avenue ES	X	X	X	X		X	X	X	X	X	X		X		X	X
Westchester HS	X	X	X	X	X	X	X		X		X	X	X	X	X	X

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The Project will be implemented per all District Standards and Specifications, as well as all applicable local and State regulations. The Project will be constructed per Division of State Architect (DSA) approved plans. 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 Campuses' 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 15268¹];
- 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 scope of the Project entails ADA compliance improvements at nine LAUSD Campuses. Such improvements may include, but are not limited to, POT upgrades and the removal of barriers; 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, and/or hardware; modifications to cafeteria counters; installation of ADA compliant signage; creation of accessible parking stalls and loading zones through re-striping; modifications to assembly seating; modifications to locker rooms, nurse's examination rooms, and dressing rooms; modifications to furniture; installation of new elevators; modifications to, or installation of, railings; and installation of assistive listening devices, intercoms, or phones.

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.

¹ CEQA Guidelines can be found at California Code of Regulations Title 14, Chapter 3, Section 15000 - Section 15387.

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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 no expansion of capacity. Such improvements may include, POT upgrades and the removal of barriers; upgrades to existing restrooms; installation of ADA ramps; modifications to arcades; installation of ADA compliant drinking fountains and sinks; installation of accessible gates, doors, thresholds, and/or hardware; modifications to cafeteria counters; creation of accessible parking stalls and loading zones through re-stripping; modifications to assembly seating; modifications to locker rooms, nurse's examination rooms, and dressing rooms; modifications to furniture; and modifications to railings. 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 ADA compliance improvements would be characterized as new, small facilities or accessory structures as defined by Section 15303 (e) "Accessory (appurtenant) structures including garages, carports, patios, swimming pools, and fences." These conversions constitute minor or limited modifications, construction and improvements within limited areas. 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 ADA compliance improvements include the construction or replacement of minor structures accessory to existing institutional facilities, including on-premise signs and small parking lots. 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.^{2,3} None of the Project sites have been designated as biologically sensitive locations.^{4,5} Additionally, the Project would not require the removal of any biologically sensitive uses. The nearest sensitive environment to the Project sites is a critical habitat area for

² City of Carson GIS, <http://www.carsonproperty.info/>, accessed April 2018.

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

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

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

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the Western Snowy Plover, located 1.2 miles west of Westchester HS. 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;*

Although other successive projects may occur on the same Campuses, they would not be of the same type. Given that these are all functioning, operating school Campuses, the nature and scale of any successive projects which may take place on any of these Campuses would be minor and would not be anticipated to incrementally contribute to significant cumulative impacts. 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 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 Environmental Impact Report for the School Upgrade Program (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.

There are no known unusual circumstances that would have a significant effect on the environment; however, there may be 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 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 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

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.

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.

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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 6.6 miles north of the closest school, Eagle Rock HS.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.*

LAUSD determined that none of these nine Campuses are eligible as historic resources.^{12, 13} Therefore, the Project would have no impact to a historic resource.

Prepared By:

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Signed by:



Date:

5/15/18

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

⁹ *Ibid.*

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

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

¹² Chattel, Inc., "Eligibility Written Descriptions," March 30, 2018.

¹³ LAUSD. 2018. Historic Resources Inventory. Los Angeles, CA.