

# Los Angeles Unified School District

## Office of Environmental Health and Safety

AUSTIN BEUTNER  
*Superintendent of Schools*

VIVIAN EKCHIAN  
*Deputy Superintendent*

CARLOS A. TORRES  
*Interim Director, Environmental Health and Safety*

### NOTICE OF EXEMPTION

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ORIGINAL FILED

OCT 01 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:**

Carver Middle School Synthetic Turf Replacement

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**Project Location – Specific:**

The Carver Middle School Synthetic Turf Replacement Project (Project) will be located on the Carver Middle School (MS) campus. The 12 acre site located at 4410 McKinley Avenue, Los Angeles, California 90011 is bifurcated by McKinley Ave. The eight acre site east of McKinley Avenue is where the main campus is primarily located. The four acre site west of McKinley Avenue is where the project is located. The Project will occur on the existing soccer field.

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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 entails replacing approximately 87,500 square feet of damaged and deteriorated synthetic turf on an existing soccer field. Turf installation will include re-grading and additional irrigation as required for satisfactory performance of the new field. The scope of work includes unclogging, cleaning and flushing the existing drainage system, testing and repairing irrigation, installing new drainage and irrigation and providing game markings and color coding. No increases in student enrollment, capacity, or intensity of use are proposed as part of this Project.

The Project will be implemented pursuant to all District Standards and Specifications,<sup>1</sup> as well as all applicable State, federal, and local regulations. The beneficiaries of the Project include Carver MS students, faculty, staff, families, school supporters, the City, and the community at large who may request access to the athletic field pursuant to the Civic Center Act (CA Ed. Code Sections 38130 - 38139).

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<sup>1</sup> 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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*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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**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 entails replacing approximately 87,500 square feet of damaged and deteriorated synthetic turf on an existing soccer field. Turf installation will include re-grading and additional irrigation as required for satisfactory performance of the new field. The scope of work includes unclogging, cleaning and flushing the existing drainage system, testing and repairing irrigation, installing new drainage and irrigation and providing game markings and color coding. The Project will not generate growth or require the addition or construction of new or expanded facilities. The Project will not present a new or expanded use of the field or 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.

As previously noted, the Project entails replacing approximately 87,500 square feet of damaged and deteriorated synthetic turf on an existing soccer field. Turf installation will include re-grading and additional irrigation as required for satisfactory performance of the new field. The scope of work includes unclogging, cleaning and flushing the existing drainage system, testing and repairing irrigation, installing new drainage and irrigation and providing game markings and color coding. Following the Project, the new field will have the same purpose, function, capacity, and use as the current field. The Project is not designed to and will not result in an increase or alteration of the current use, function, or capacity of the existing field or campus. Therefore, the Project fulfills the requirements of CEQA Guidelines Section 15302.

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

### 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 setting.<sup>3</sup> The surrounding uses are primarily commercial. The campus has not been designated as a biologically sensitive site or location and does not contain sensitive resources or habitat that will be impacted by the Project. The nearest significant ecological area (SEA) is Griffith Park which is located approximately 8 miles northwest of the Campus.<sup>4</sup> The nearest critical habitat is designated as such for the California Gnatcatcher and is located approximately 9 miles northeast of the site.<sup>5</sup> 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;*

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 maintenance activities or upgrades will occur on the 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 will not result in potentially 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 that would have a significant effect on the environment. The Project entails replacing approximately 87,500 square feet of damaged and deteriorated synthetic turf on an existing soccer field. Turf installation will include re-grading and additional irrigation as required for satisfactory performance of the new field. The scope of work includes unclogging, cleaning and flushing the existing drainage system, testing and repairing irrigation, installing new drainage and irrigation and providing game markings and color coding. The project does not constitute an expansion of use. There will be minor ground-disturbing activities associated with the installation of the replacement synthetic turf. If construction activities require import or export of soils and materials, the Office of Environmental Health & Safety (OEHS) must be notified to provide oversight to ensure that these activities are conducted in compliance with the requirements of District Specification 01 4524,<sup>6</sup> 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 School Upgrade Program Environmental Impact Report Standard Conditions (SC) of Approval SC-CUL-13, SC-CUL-15, SC-CUL-18, and SC-TCR-1, construction activities must be stopped immediately and OEHS notified upon discovery of subsurface features, such as buried resources (i.e., paleontological, archaeological, and tribal cultural resources), tanks or seepage pits or stained/odoriferous soils.<sup>7</sup>

<sup>3</sup> City of Los Angeles. ZIMAS. Available at: <http://zimas.lacity.org/>. Accessed September 2018.

<sup>4</sup> Los Angeles County Department of Regional Planning, [http://gis.planning.lacounty.gov/GIS-NET3\\_Public/Viewer.html](http://gis.planning.lacounty.gov/GIS-NET3_Public/Viewer.html), accessed September 2018.

<sup>5</sup> United States Fish and Wildlife Service Critical Habitat Portal, <https://ecos.fws.gov/ecp/report/table/critical-habitat.html> accessed September 2018.

<sup>6</sup> [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 OEHS, "School Upgrade Program Final Environmental Impact Report," <http://achieve.lausd.net/ceqa>, Adopted by the Board of Education on November 10, 2015 and Standard Conditions of Approval.



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 25 miles southwest of State Route 2 (SR 2), the nearest officially designated State scenic highway.<sup>8</sup> The Project will 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.

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>9</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.*

Opened in 1912, Carver MS does meet the 45-year age criterion for consideration as a historic resource. Survey LA found that Carver MS appeared eligible for listing in the National and California Register of Historic Places as an individual property.<sup>10</sup>

The proposed work to replace the deteriorated turf will not remove, destroy, or obstruct any historic character-defining features and will be undertaken in accordance with the *Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings (Secretary's Standards)*, specifically Standards No. 9 and 10 which apply to adjacent new construction, and the *Los Angeles Unified School District Design Guidelines and Treatment Approaches for Historic Schools (LAUSD Design Guidelines)*.<sup>10, 11</sup> The Project is replacing an existing soccer field with a new soccer field and is not anticipated to result in an impact to the historical campus.

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 scope of work 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* and will not cause a substantial adverse change in the significance of a historical resource.

<sup>8</sup> Los Angeles County Department of Regional Planning, [http://gis.planning.lacounty.gov/GIS-NET3\\_Public/Viewer.html](http://gis.planning.lacounty.gov/GIS-NET3_Public/Viewer.html), accessed September 2018.

<sup>9</sup> California Department of Toxic Substances Control. DTSC Databases. Available at: <http://www.dtsc.ca.gov/database/>. Accessed September 2018.

<sup>10</sup> LAUSD OEHS. 2017. LAUSD Historic Resource Inventory Database.

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Prepared By:

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Signed by:



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

Date:

