

Los Angeles Unified School District

Office of Environmental Health and Safety

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Superintendent of Schools

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NOTICE OF EXEMPTION

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JUL 26 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:

Gratts Elementary School – Playground Repaving Project

Project Location – Specific:

Gratts Elementary School (ES; Campus) is located at 309 Lucas Avenue, Los Angeles, California, 90017. The 4.2-acre Campus is bound by 4th Street and multi-family residential on the south, Wilmer Street and multi-family residential on the west, 3rd Street on the north, and Lucas Avenue on the east.

Project Location – City:

Los Angeles

Project Location – County:

Los Angeles

Description of Nature, Purpose, and Beneficiaries of Project:

The scope of the Gratts ES Playground Repaving Project (Project) includes the replacement of the top 24" of asphalt paving and landscaping on the approximately 95,000 square foot playground area including removal and replacement of subgrade. The Project will also entail removing and replacing concrete paving along path of travel adjacent to the playground and at the main entrance; upgrading the children's restrooms in building A and the adult's restrooms in building C; replacing two drinking fountains; and providing new fire alarm equipment in the restrooms and in building A. All improvements will be Americans with Disabilities Act (ADA)¹ compliant as mandated by the Division of State Architect (DSA).

Restroom modifications include installing new grab bars in toilet stalls; removing, shifting, and installing new partitions to provide clearance for new ambulatory stalls and stall doors to swing out; relocating wall signs, and various ADA

¹ United States Department of Justice. The Americans with Disabilities Act of 1990 and Revised Regulations Implementing Title II and Title III.
https://www.ada.gov/2010_regs.htm

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accessible features. A new concrete curb will be installed on the southwest section of the campus. Also, new playground markings, playground poles and footings, and a new handball wall will be constructed. Of the 37 total non-protected trees on campus, 10 will be removed, however they will be replaced at a ratio of 1:1.

No increases in 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, as well as all applicable State, federal, and local regulations, including DSA review and approval of design drawings and those Standard Conditions provided in LAUSD's Program Environmental Impact Report for the School Upgrade Program (Program EIR).² The beneficiaries of the Project include Gratts ES 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 15268³];
- 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 15304 – Minor Alterations to Land*
- 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 replacing paving for the playground and implementing ADA compliance improvements, including modifying the boy's and girl's restrooms. These improvements constitute minor alterations to existing public facilities. The Project will not result in the physical expansion of school facilities and will not increase the intensity of use, nor will it increase student or staff capacity. Therefore, the Project satisfies 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.

² LAUSD OEHS, "School Upgrade Program Final Environmental Impact Report," <http://achieve.lausd.net/ceqa>, Adopted by the Board of Education on November 10, 2015.

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



The replacing of paving for the playground and implementing ADA compliance improvements to the restrooms and path of travel will have no change in purpose of use and no expansion of capacity at Gratts ES. This Project does not include the addition of new classrooms. Therefore, the Project satisfies the requirements of CEQA Guidelines Section 15302.

Section 15304 Minor Alterations to Land

Class 4 consists of minor public or private alterations in the condition of land, water, and/or vegetation which do not involve the removal of healthy, mature, scenic trees except for forestry and agricultural purposes.

Ten trees will be removed from the Campus for this Project. These trees include seven Coast redwoods (*Sequoia sempervirens*), and one of each of the following: Goldenrain tree (*Koelreuteria paniculata*), camphor (*Cinnamomum camphora*), and Gold medallion (*Cassia leptophylla*).⁴ As documented in a tree assessment that was prepared for the Project, none of the trees being removed are historic or protected.⁵ Therefore, the Project satisfies the requirements of CEQA Guidelines Section 15304.

Section 15300.2 – Exceptions

Section 15300.2 of the CEQA Guidelines, Exceptions, provides conditions under which categorical exemptions are inapplicable. Review of this Project indicates that it would not violate any of the exceptions, as described below.

1. *The projects would occur in certain specified sensitive environments or locations;*

The Project is located on a fully developed, existing school site within an urbanized community.⁶ The Campus has not been designated as a biologically sensitive location. The nearest Federal Critical habitat is for the Coastal California gnatcatcher, located approximately 9.5 miles east of the Campus.⁷ The nearest Significant Ecological Area (SEA) is Griffith Park, located approximately 6 miles northwest of the Campus.⁸ There is no suitable habitat for this species located within or immediately adjacent to the Campus. No impacts to listed species or their habitat is expected to occur as a result of this Project.

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

As an active school site, the Campus is subject to routine maintenance and operational activities. There are no other successive projects of the same type planned at the Campus during the same construction period. Therefore, no cumulative impacts are expected to result from the installations and modifications associated with 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 associated with the Project. There is nothing unusual about the Project, the Campus, or the surrounding area that would preclude the use of this exemption. There will be minor grading and ground-disturbing activities associated with the Project. Therefore, consideration must be given to the management

⁴ City of Los Angeles Protected Tree Report July 25, 2017.

⁵ *Ibid.*

⁶ City of Los Angeles, Planning Department, *Zoning and Information Management System*, <http://zimas.lacity.org/>, accessed June 2018.

⁷ United States Fish and Wildlife Service Critical Habitat Portal, <https://ecos.fws.gov/ecp/report/table/critical-habitat.html> accessed June 2018.

⁸ Los Angeles County Department of Regional Planning, http://gis.planning.lacounty.gov/GIS-NET3_Public/Viewer.html, accessed June 2018.

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of excavated soil associated with earthwork activities. If construction or earthmoving activities require import or export of soils and materials, LAUSD's Office of Environmental Health & Safety (OEHS) will 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. Furthermore, as set forth in standard conditions (SC) 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.⁹ Lastly, any construction and demolition waste shall be recycled to the maximum extent feasible per SC-USS-1 of the Program EIR. Therefore, the Project would not have a significant effect on the environment due to unusual circumstances.

If vegetation removal is scheduled to occur between February 1 and August 31, a nesting bird survey would be performed prior to removal activities, per SC-BIO-3 of the Program EIR.¹⁰ Compliance with the provisions of LAUSD's Program EIR will ensure that no significant impacts will result.

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 the Project is State Route 2.¹¹ The Campus is located approximately 10 miles southwest of State Route 2, which is a sufficient distance from this resource to be outside of the view shed and would not degrade the characteristics that contribute to its scenic eligibility. 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*

The Campus is not located on a site that is included on any list compiled pursuant to Section 65962.5 of the Government Code. 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.*

Originally opened in 1995, Gratts ES does not meet the age criteria for evaluation as a historical resource pursuant to CEQA. Gratts ES does not appear eligible for federal, state or local listing under any of the applicable criteria and is therefore not considered to be a historical resource pursuant to CEQA. Therefore, the Project would not cause a substantial adverse change in the significance of a historic resource.

⁹ LAUSD OEHS, "School Upgrade Program Final Environmental Impact Report," <http://achieve.lausd.net/ceqa>, Adopted by the Board of Education on November 10, 2015.

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

¹¹ Los Angeles County Department of Regional Planning, http://gis.planning.lacounty.gov/GIS-NET3_Public/Viewer.html, accessed June 2018.

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Signed by:

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Date:



Carlos Torres,
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