

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

Project Title:

Proposition 39 Energy Efficiency Projects at 48 LAUSD Campuses

Project Location – Specific:

1. Alfred B. Nobel Middle School - 9950 Tampa Ave, Northridge, CA 91324
2. Beckford Charter for Enriched Studies - 19130 Tulsa St, Northridge, CA 91326
3. Calahan Community Charter - 18722 Knapp St, Northridge, CA 91324
4. Calvert Charter for Enriched Studies - 19850 Delano St, Woodland Hills, CA 91367
5. Canyon School - 421 Entrada Dr, Santa Monica CA, CA 90402
6. Carpenter Community Charter ES - 3909 Carpenter Ave, Studio City, CA 91604
7. Castlebay Lane ES - 19010 Castlebay Ln, Northridge, CA 91326
8. Chatsworth Charter - 10027 Lurline Ave, Chatsworth, CA 91311
9. Colfax Charter ES - 11724 Addison St, N Hollywood, CA 91607
10. Community Magnet ES - 11301 Bellagio Rd, Los Angeles, CA 90049
11. Darby Avenue Charter - 10818 Darby Ave, Northridge, CA 91326
12. Dr. Theo Alexander ES - 3737 South Figueroa Street, Los Angeles, Los Angeles, CA 90007
13. El Oro Way Charter ES - 12230 El Oro Way, Granada Hills, CA 91344
14. Emerson Middle School - 1650 Selby Ave, Los Angeles, CA 90024
15. Enadia Tech. Charter ES - 22944 Enadia Way, West Hills, CA 91307
16. George Ellery Hale Charter MS - 23830 Califa St, Woodland Hills, CA 91367
17. Granada Charter ES - 17170 Tribune St, Granada Hills, CA 91344
18. Grover Cleveland Charter - 8140 Vanalden Ave, Reseda, CA 91335
19. Haynes Charter ES - 6624 Lockhurst Drive, West Hills, CA 91307
20. Henry MS - 17340 San Jose St, Granada Hills, CA 91344
21. Holmes High School - 9351 Paso Robles Ave, Northridge, CA 91325

333 South Beaudry Avenue, 21st Floor, Los Angeles, CA 90017 • Telephone (213) 241-3199 • Fax (213) 241-6816

*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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22. John Adams MS - 151 W 30th St, Los Angeles, CA 90007
23. Justice Street Charter ES - 23350 Justice St, West Hills, CA 91304
24. Kenter Canyon School - 645 N Kenter Ave, Los Angeles, CA 90049
25. Knollwood Preparatory Academy - 11822 Gerald Ave, Granada Hills, CA 91344
26. Lockhurst Charter ES - 6170 Lockhurst Drive, Woodland Hills, CA 91367
27. Madison MS - 13000 Hart St, N Hollywood, CA 91605
28. Markham MS - 1650 E 104TH St, Los Angeles, CA 90002
29. Marquez Charter School - 16821 Marquez Ave, Pacific Palisades 90272
30. Narbonne HS - 24300 S Western Ave, Harbor City, CA 90710
31. Open Charter Magnet ES - 5540 W. 77TH ST, Los Angeles, CA 90045
32. Palisades Charter ES - 800 Via De La Paz, Pacific Palisades, CA 90272
33. Plainview Charter ES - 10819 Plainview Ave, Tujunga, CA 91042
34. Pomelo Charter ES - 7633 March Ave, West Hills, CA 91304
35. Porter MS - 15960 Kingsbury St, Granada Hills, CA 91344
36. Reed MS - 4525 Irvine Ave, N Hollywood, CA 91602
37. Revere MS - 1450 Allenford Ave, Los Angeles, CA 90049
38. Riverside Drive Charter ES - 13061 Riverside Dr, Sherman Oaks, CA 91423
39. South Gate MS - 4100 Firestone Blvd, South Gate, CA 90280
40. Superior Street Elementary - 9756 Oso Ave, Chatsworth, CA 91311
41. Taft Charter - 5461 Winnetka Ave, Woodland Hills, CA 91364
42. Topanga Learn-Charter ES - 22075 Topanga School Road, Topanga, CA 90290
43. Topeka Charter ES - 9815 Topeka Dr, Northridge, CA 91324
44. Van Gogh Charter - 17160 Van Gogh ST, Granada Hills, CA 91344
45. Welby Way Charter ES - 23456 Welby Way, West Hills, CA 91307
46. Woodlake Charter ES - 23231 Hatteras St, Woodland Hills, CA 91367
47. Woodland Hills Academy -20800 Burbank Blvd, Woodland Hills, CA 91367
48. Woodland Hills ES - 22201 San Miguel St, Woodland Hills, CA 91364

Project Location – City:

Various (see above)

Project Location – County:

Los Angeles

Description of Nature, Purpose, and Beneficiaries of Project:

The scope of the project includes Proposition 39¹. (Prop 39) energy efficiency improvements at the 48 Los Angeles Unified School District (LAUSD) school campuses listed above (collectively referred to as the "Project"). Approved by California voters in 2012, Prop 39 (the California Clean Energy Jobs Act) is a State grant program that allocates revenue to local education agencies to support energy efficiency projects. Through Prop 39, LAUSD will receive funds over a five year period to implement projects that improve energy efficiency in the District's existing buildings. The Project is predicted to significantly reduce energy use in existing building systems on several campuses and will focus on lighting, heating ventilation and air conditioning (HVAC) systems, controls, and plumbing. LAUSD's Prop 39 program will focus on schools with high electricity costs.

The primary purpose of the Project is to retrofit or replace existing electrical, HVAC and plumbing fixtures with new energy efficient ones. Project scope for all of the schools includes the following 1) Interior lighting fixture retrofit, 2)

¹ <http://www.energy.ca.gov/efficiency/proposition39/>

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Interior Lighting Occupancy Sensors/Switches; 3) Exterior Lighting Retrofits; and 4) High Efficiency Transformer Replacement.

The Project will be constructed per Division of State Architect approved design specifications. The Project will be implemented per all applicable local and State regulations, the Americans with Disabilities Act (ADA), 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).²

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 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*
- 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 includes various energy efficiency improvements at each of the campuses, focusing on upgrading lighting, HVAC, controls, and plumbing systems. All of the proposed activities would occur within the area occupied by existing facilities at the school sites. The Project would not require the addition or construction of any new or expanded 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.

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

³CEQA 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. Specifically, it includes the replacement or reconstruction of existing utility systems and/or facilities involving negligible or no expansion of capacity.

The Prop 39 energy efficiency improvements include upgrades to existing structures and facilities with no change in purpose of use and no expansion of capacity. Therefore, the Project satisfies 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 this Project indicates that it would not violate any of the exceptions, as described below.

1. *The project will occur in certain specified sensitive environments or locations;*

This exception only applies to Class 3, 4, 5, 6 or 11 exemptions. Therefore, it does not apply to the Project.

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 active school campuses, it is anticipated that projects such as routine maintenance activities or upgrades will occur on the campuses in the future. However, there are currently no known successive projects of the same type or scale planned for the campuses. As it stands, the Project is not expected to result in significant impacts. Therefore, no cumulative impacts will result from the Project and successive projects of the same type occurring 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 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 vegetation 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.⁴ Compliance with District specifications 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 will be some electromagnetic fields (EMF) emitted from the new energy efficient transformers. EMFs are generated by the current flow in a conductor with its strength determined by the magnitude of the current being generated. An important consideration to limit EMF field strengths is to maintain distance from the transformer

⁴ 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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source, which decrease exponentially with distance. Installations adjoining a common wall may produce field strengths at elevated levels within adjacent classroom/office space. Generally, there should not be an appreciable increase in stray fields above existing background levels following the replacement of the transformer. However, out of an abundance of caution, in cases where a transformer will be placed immediately next to a wall shared with rooms occupied by students or staff, OEHS shall be notified to determine if the fields associated with the transformer installation are within acceptable limits. If it is determined that the fields are elevated above anticipated background levels, OEHS will identify measures to limit field strengths to acceptable levels. Therefore, the Project would not have a significant effect on the environment due to unusual circumstances.

There may be some minor ground-disturbing activities associated with the Project that will occur, but such activities are not considered unusual circumstances for the classes of projects under which this exemption is claimed. Nevertheless, consideration must be given to the management of excavated soils associated with earthwork activities for the Project. 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, the OEHS must be notified to provide oversight to ensure that these activities are conducted in compliance with the requirements of District Specification 01 4524,⁵ 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 Standard Conditions of Approval (SC) SC-CUL-13, SC-CUL-15, SC-CUL-18, and SC-CUL-19⁶ 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. Construction and demolition waste shall be recycled to the maximum extent feasible per SC-USS-1 of the Program EIR.⁷ 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 the Project is the State Route 2, located approximately 6.5 miles southeast of Plainview Charter ES, which is the closest of the 48 schools.⁸ This is a sufficient distance from this resource to be outside of the view shed, so the Project will 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 Project will occur on existing school campuses that are not included on any list compiled pursuant to Section 65962.5 of the Government Code.⁹ 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.*

⁵ http://www.laschools.org/documents/file?file_id=219798234&show_all_versions_p=t

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 *Ibid.*

⁸ http://www.dot.ca.gov/hq/LandArch/scenic_highways/index.htm, October 9, 2009

⁹ California, State of, Department of Toxic Substances Control, Envirostor Database, <http://www.envirostor.dtsc.ca.gov/public/search.asp>, accessed September 10, 2018.

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Each of the schools are 45-years old or older, meeting the age criterion for consideration as historical resources under the California Register of Historical Resources and CEQA guidelines. While not all of the schools have been formally evaluated as historical resources, they are considered potentially eligible due to their age, for the purpose of this Project.

The Project does not propose any significant alterations that would result in material impairment of the potential historical resources and would not result in a negative effect on their eligibility. However, the Project will be subject to internal review by OEHS' Historic Preservation Specialist at the schematic, 50 percent/design development phase, and 100 percent construction drawings phase to ensure ongoing compliance 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)* and *Los Angeles Unified School District Design Guidelines and Treatment Approaches for Historic Schools (LAUSD Design Guidelines)*.^{10,11,12} OEHS' Historic Preservation Specialist will verify that the Project will 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.

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 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 historic resource.

¹⁰ National Park Service, Department of the Interior, Washington, D.C. 1995. "The Secretary of the Interior's Standards for Rehabilitation, with Guidelines for Rehabilitating, Preserving, Restoring, and Reconstructing Historic Buildings."

¹¹ National Park Service, Department of the Interior, Washington DC. 1997. *Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings*. Available at: <https://www.nps.gov/tps/standards/rehabilitation/rehabilitation-guidelines.pdf>

¹² LAUSD OEHS, 2015. "Los Angeles Unified School District Design Guidelines and Treatment Approaches for Historic Schools."

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Prepared By:

Alex Campbell,
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Signed by:



Carlos A Torres,
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9/17/18
