

# 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 29 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

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**Project Title:**

Glassell Park Elementary School Concrete Ramp and Seismic Retrofit of Main Building

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**Project Location – Specific:**

Glassell Park Elementary School (ES) is located at 2211 West Avenue 30, Los Angeles, CA 90065 on a 1-acre campus (Campus). The Campus is bound by Carlyle Street to the north; West Avenue 31 to the east; Cazador Street to the south; and West Avenue 30 to the west.

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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 scope of the Concrete Ramp and Seismic Retrofit Project (Project) consists of Americans with Disabilities Act (ADA) compliance improvements at Glassell Park ES (Campus) and seismic retrofit of the Main Building. The improvements include accessible route upgrades; removal of barriers; installation of a concrete ramp to provide an accessible entrance to a side entrance to the Main Building; strengthening existing concrete wall piers; installing new cross ties, blocking, and new anchors; sistering new joists; strengthening existing diaphragm; new girls restroom and staff restroom upgrade on the first floor; a new boys restroom on the second floor; and a new elevator in the Main Building.

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).<sup>1</sup> The primary purpose of the Project is to comply with current ADA access requirements and seismic retrofit 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 Glassell Park ES and the community at large who may request access to the facilities and grounds of the Campus pursuant to the Civic Center Act (CA Ed. Code Sections 38130 - 38139).

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**Name of Public Agency Approving the Project:**

Los Angeles Unified School District

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**Name of Person or Agency Carrying Out Project:**

Los Angeles Unified School District

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**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*
  - *CEQA Guidelines Section 15303 – New Construction or Conversion of Small Structures*
  - *CEQA Guidelines Section 15311 – Accessory Structures*
- Statutory Exemption:

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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.

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

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**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 at Glassell Park ES. Such improvements include accessible route upgrades; removal of barriers; and installation of a concrete ramp to provide an accessible entrance to the Main Building. The proposed Project components would involve minor alterations to existing public structures and would occur within the area occupied by existing facilities at the Project site. The Project would not present a new or expanded use of the Project site. Therefore, the Project constitutes minor alterations to existing school sites 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 the 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 will reconstruct the Main Building, an existing school site, to provide an earthquake resistant structure. It will not increase the capacity of the school. 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 of new small structures, including an ADA compliant ramp and a new elevator. 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 of minor structures accessory to existing institutional facilities, such as accessible route upgrades; removal of barriers; installation of a ADA compliant ramp; a new elevator; a new boy's restroom; and a new girl's restroom. Therefore, the Project satisfies the requirements of CEQA Guidelines Section 15311.

Section 15300.2 – Exceptions

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 is a fully developed Campus within an urbanized community.<sup>3</sup> None of the Project sites have been designated as biologically sensitive locations. The nearest sensitive environment to the Project site is a Significant

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

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Ecological area, Griffith Park, located approximately 2.7 miles northwest of Glassell Park ES.<sup>4,5</sup> 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 Campus is an active school site, there will likely be ongoing maintenance activities and minor projects on the Campus to keep the school 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, 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 of approval (SC)-BIO-3 of the Program EIR.<sup>6</sup>

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 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.<sup>7</sup> Furthermore, as set forth in 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.<sup>8</sup> Lastly, any construction and demolition waste shall be recycled to the maximum extent feasible per SC-USS-1 of the Program EIR.<sup>9</sup> 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 an official state scenic highway;*

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

<sup>5</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>6</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.

<sup>7</sup> LAUSD OEHS, "Section 01 4524 Environmental Import/Export Materials Testing", [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>8</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.

<sup>9</sup> *Ibid.*

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The closest officially designated state scenic highway to the Project site is State Route 2 (SR2), which is located approximately 8.7 miles northeast of Glassell Park ES.<sup>10</sup> 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*

The Project is not located on a site that is included on any list compiled pursuant to Section 65962.5 of the Government Code.<sup>11</sup> 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.*

Glassell Park ES was constructed in 1924 in the Spanish Colonial Revival style and was renovated in 1934-1935 in the 1930s PWA Moderne style. Due to its architectural significance, the Campus is listed on the National Register of Historic Places and the California Register of Historical Resources.

The proposed Project 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 Treatment Approaches for Historic Schools (LAUSD Design Guidelines)*.<sup>12,13</sup> The proposed Project 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 proposed Project 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 Project.

The following will guide the design of the concrete ramp portion of the Project:

- The Design team will include a Historic Architect meeting the professional qualifications standards described in the *LAUSD Design Guidelines and the Secretary's Standards*.<sup>14</sup>
- All work will follow the *LAUSD Design Guidelines* and the *Secretary's Standards*.
- 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.

<sup>10</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>11</sup> [http://www.dtsc.ca.gov/SiteCleanup/Cortese\\_List.cfm](http://www.dtsc.ca.gov/SiteCleanup/Cortese_List.cfm), accessed September 2018.

<sup>12</sup> National Park Service, Department of the Interior, Washington, D.C. 1995. "The Secretary of the Interior's Standards for the Treatment of Historic Properties."

<sup>13</sup> LAUSD OEHS, 2015. "Los Angeles Unified School District Design Guidelines and Treatment Approaches for Historic Schools."

<sup>14</sup> Ibid.

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- 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*, 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.

A *Secretary's Standards* conformance review for the seismic retrofit portion of the Project was completed by OEHS's Historic Preservation Specialist for Glassell Park ES to ensure compliance with applicable guidelines (the *Secretary's Standards* and *Los Angeles Unified School District Design Guidelines and Treatment Approaches for Historic Schools*). The *Secretary's Standards* conformance review found that the Project conforms with the *Secretary's Standards*.<sup>15</sup> As the work at the school 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), will not cause a substantial adverse change in the significance of a historical resource, and will not result in a significant effect on the environment.

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* and would not cause a substantial adverse change in the significance of a historical resource.

Prepared By:

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Signed by:



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

Date:

10/25/18

<sup>15</sup> LAUSD OEHS. 2018 "Glassell Park ES SOIS Compliance Review."