

Los Angeles Unified School District

Office of Environmental Health and Safety

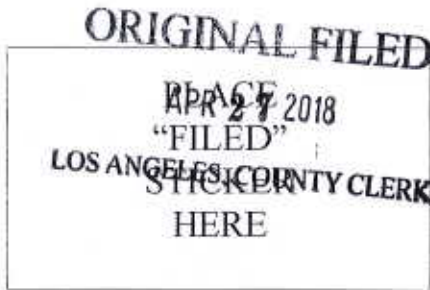
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Interim Superintendent of Schools

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NOTICE OF EXEMPTION



To: County Clerk and Registrar-Recorder
County of Los Angeles
12400 Imperial Highway
Norwalk, CA 90650

From: LAUSD OEHS
333 South Beaudry Avenue
21st Floor
Los Angeles, CA 90017

Project Title:

Granada Hills Charter High School Plumbing Repair Project

Project Location – Specific:

Granada Hills Charter High School (GHCHS) is located in the Community of Granada Hills in the City of Los Angeles, west of the 405 Freeway and south of the 118 Freeway. The campus is bounded by Kingsbury Street to the north, Zelzah Avenue to the east, Hiawatha Street to the south and Lindley Avenue to the west.

Project Location – City:

Los Angeles

Project Location – County:

Los Angeles

Description of Nature, Purpose, and Beneficiaries of Project:

The scope of the Project includes removing and replacing portions of the existing plumbing system, and implementing Americans with Disabilities Act (ADA)¹ compliance improvements. The ADA compliance improvements are legal requirements mandated by the Division of State Architect (DSA) and include upgrading all restrooms to ADA compliant restrooms, and providing path of travel (POT) upgrades from the parking area to the bleachers, Administration Building, and Classroom Building C.

The plumbing repairs include replacing galvanized piping and plumbing features; cleaning, repairing and replacing building sewer lines; replacing ceiling gas lines; installing earthquake valves for the gas water heaters; and replacing fire sprinkler heads.

The Project will be constructed per DSA approved design specifications. The Project will be implemented per all applicable local and State regulations, the ADA, as well as all District Standards and Specifications; such as those provided

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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*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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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 the school 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 removing and replacing portions of the existing plumbing system and implementing ADA compliance improvements. 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.

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 removal and replacement of portions of the existing plumbing system and implementation of ADA compliance 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.

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.

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

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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;*

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 an active school campus, it is anticipated that projects such as routine 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 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 may be some minor ground-disturbing activities associated with the Project, but such 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 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

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.

⁵ LAUSD OEHS, "Section 01 4524 Environmental Import/Export Materials Testing"
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.

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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 State Route 2, located approximately 19 miles southeast of the Campus.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.*

Constructed in 1960, the Campus is over 45-years old, meeting the age criterion for consideration as an historic resource under CEQA guidelines. A District survey has not yet been conducted for the campus. However, in 2015 SurveyLA found the Campus eligible for listing in California Register of Historic Resources and National Register of Historic Places as an excellent example of a post-World War II Los Angeles Unified School District school building.¹⁰

Therefore, the Project shall follow the *Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings*, the *Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (Secretary's Standards)* and *Los Angeles Unified School District Design Guidelines and Treatment Approaches for Historic Schools (LAUSD Design Guidelines)*.^{11,12,13} 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. To ensure that the Project follows the *Secretary's Standards* and *LAUSD Design Guidelines*, and avoids adverse impacts to the historic district, the following considerations will guide the design of new construction; infrastructure upgrades; ADA compliance components; and any restoration of landscape, hardscape, and playgrounds.

- The Design-Build team will include a Historic Architect meeting the professional qualifications standards described in the *LAUSD Design Guidelines*.¹⁴

⁷ *Ibid.*

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

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

¹⁰ LAUSD OEHS, 2017. LAUSD Historic Resource Inventory Database.

¹¹ 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."

¹² 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>

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

¹⁴ *Ibid.*

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- All work will follow the *LAUSD Design Guidelines* and the *Secretary's Standards*.¹⁵
- The Historic Architect will identify and provide to the Design-Build team options for meeting the above-mentioned 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 retain and reinforce character-defining features of the historic district and its contributing features, and (2) ensuring that ADA compliance components, and restoration of landscape, hardscape, and playgrounds follow 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) infrastructure upgrades; ADA components; and restoration of landscape, hardscape, and playgrounds are carried out in a way that retains and protects character-defining features.
- 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 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 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* and would not cause a substantial adverse change in the significance of a historic resource.

Prepared By:

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Signed by:



Robert Laughton
CEQA Officer of the Los Angeles Unified School District

Date:

4/16/18

¹⁵ 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."