

Los Angeles Unified School District

Office of Environmental Health and Safety

VIVIAN EKCHIAN
Interim Superintendent of Schools

ORIGINAL FILED

MAY 04 2018

LOS ANGELES, COUNTY CLERK

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Deputy Director, Environmental Health and Safety

NOTICE OF EXEMPTION

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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
21st Floor
Los Angeles, CA 90017

Project Title:

HVAC Replacement & Interim Housing at Corona Avenue Elementary School, Edison Middle School, and Main Street Elementary School

Project Location – Specific:

The HVAC Replacement & Interim Housing Project at Corona Avenue Elementary School (ES), Edison Middle School (MS), and Main Street ES (Campuses)(collectively referred to as the "Project") will be located at:

- Corona Avenue Elementary School – 3825 Bell Avenue, Bell, CA 90201
- Edison Middle School – 6500 Hooper Avenue, Los Angeles, CA 90001
- Main Street Elementary School – 129 East 53rd Street, Los Angeles, CA 90011

Project Location – City:

Various (see above)

Project Location – County:

Los Angeles

Description of Nature, Purpose, and Beneficiaries of Project:

The Project will entail the placement of temporary portable classroom units that will be used as interim housing during the phased removal and replacement of existing heating, ventilating, and air conditioning (HVAC) systems with new equipment and systems at Corona Avenue ES, Edison MS, and Main Street ES.¹ The Project will also include the installation of water, sewer, and electrical lines for the portable classrooms.

The portable classrooms will provide interim educational space for classrooms that are displaced during the Project at the Campuses. The Project will be consistent with LAUSD's requirements and the applicable standards, Americans with

¹ LAUSD's Office of Environmental Health and Safety (OEHS) previously reviewed the HVAC replacement efforts at Corona ES, Edison MS, and Main Street ES and determined that they were considered an "activity not requiring CEQA." The current Project scope expands on the previously reviewed effort and incorporates interim housing components.

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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Disabilities Act (ADA; including but not limited to accessibility and path of travel), electrical, utility, and fire safety upgrades and improvements. The portable classrooms and appurtenant facilities will be removed upon completion of the HVAC replacement efforts. No increases in student enrollment, capacity or intensity of use are proposed as part of this Project.

The Project will be implemented in accordance with all applicable State, federal, and local regulations, and all applicable LAUSD specifications, standards, and/or guidelines such as those provided in LAUSD's Program Environmental Impact Report for the School Upgrade Program (Program EIR) which was completed in compliance with the California Environmental Quality Act (CEQA).² The Project will be constructed per Division of State Architect approved plans. The beneficiaries of this Project include students and staff at Corona Avenue ES, Edison MS, Main Street ES and the community at large who may request access to the school 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 15304 – Minor Alterations to Land*
 - *CEQA Guidelines Section 15314 – Minor Additions to Schools*
- 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 will entail the placement and removal of temporary portable classrooms on the Campuses. In addition to the HVAC system replacement, the Project will require the installation of utilities at the portable classrooms and some minor trenching at the Campuses. These components are considered minor alterations and replacement of facilities at existing Campuses.

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.

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ADA-compliant upgrades such as creating or enhancing the path of travel (POT) and installing accessible features (e.g. concrete repair, striping work, restroom remodel, guardrails, ramps, etc.) will be completed at the portable classrooms, as necessary and required. No permanent buildings or large structures will be installed or removed as a part of the Project. The Project will be installed completely within the boundaries of the existing Campuses and will not require or result in the expansion of use beyond the Campuses. Additionally, the Project will not include or result in the growth of the student populations or Campuses. Interim housing will be removed once the HVAC installations are complete and the displaced classes will be returned to their permanent locations. Therefore, the Project satisfies the requirements of CEQA Guidelines Section 15301.

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.

The Project consists of the temporary installation of portable classrooms on existing Campuses. The installation of the portable classroom units will not require major construction activities or demolition. The portable classrooms will arrive to the Campuses preassembled. Although the installations may require foundations⁴ and trenching for utilities to be erected and installed in currently paved areas on the Campuses, the anticipated construction-related activities and equipment associated with these efforts will be limited in size, duration, and scope. As such, the Project constitutes minor alterations to existing schools. The portable classrooms will be located in currently unoccupied areas on the Campuses. Existing paving will be temporarily removed (for the installation of utilities) and replaced in kind – as such, the Project will require minimal ground disturbance.

The Project will not be anticipated to require the removal of any healthy, mature, scenic trees from the Campuses. If the Project scope changes 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 (SC) of approval SC-BIO-3 of the Program EIR.⁵ Therefore, the Project satisfies the requirements of CEQA Guidelines Section 15304.

Section 15314 – Minor Additions to Schools

Class 14 consists of minor additions to existing schools within existing school grounds where the addition does not increase original student capacity by more than 25% or ten classrooms, whichever is less.

As previously noted, the Project consists of the removal and installation of portable classrooms as well as the replacement of HVAC systems on existing school Campuses. In accordance with the CEQA Guidelines Section 15314, the addition of a portable building is included in this exemption. The portable classrooms are temporary minor additions which will house displaced classes on existing Campuses and will be removed following completion of the phased HVAC installation efforts. Additionally, the Project is not intended or expected to result in an increase in the student populations or campus capacities. Therefore, the Project satisfies the requirements of CEQA Guidelines Section 15314.

Section 15300.2 – Exceptions

⁴ Temporary portable buildings are generally situated above ground on wood or concrete foundations.

⁵ 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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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 be located on existing Campuses located within an urban setting.^{6,7} The Campuses have not been designated as biologically sensitive sites and do not contain sensitive resources that will be impacted by the Project. The tables below show the distances of the Project sites to the nearest sensitive environments and critical habitats. The nearest sensitive environment is the Puente Hills Significant Ecological Area (SEA; located 6.4 miles northeast of Corona Avenue ES), which also contains the nearest critical habitat (for the Coastal California gnatcatcher).^{8,9} The Campuses do not contain any sensitive vegetation, habitat, or resources and as such, the Project will not impact sensitive environments or locations.

Distance of Each School to the Nearest Sensitive Environment¹⁰

School	Distance to the Nearest Sensitive Environment	Description of Sensitive Environment
Corona Avenue ES	6.4 miles	Puente Hills SEA
Edison MS	9.0 miles	Puente Hills SEA
Main Street ES	8.5 miles	Griffith Park SEA

Distance of Each School to the Nearest Critical Habitat¹¹

School	Distance to the Nearest Critical Habitat	Description of Critical Habitat
Corona Avenue ES	6.4 miles	Coastal California gnatcatcher
Edison MS	9.0 miles	Coastal California gnatcatcher
Main Street ES	10.1 miles	Coastal California gnatcatcher

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. It is anticipated that projects such as maintenance activities or upgrades will occur on these Campuses in the future, however, there are currently no known successive projects of the same type or scale planned for the Campuses. Therefore, no cumulative impacts will result from the Project and successive projects of the same type and at the same place over time.

⁶ City of Bell. Community Development Department. Available at: <http://bellmap.maps.arcgis.com/apps/webappviewer/index.html?id=eb14248d295344378bfff6765cf3bb834>, Accessed March 2018.
⁷ City of Los Angeles, Department of City Planning. ZIMAS. Available at: <http://zimas.lacounty.org>. Accessed March 2018.
⁸ Los Angeles County Department of Regional Planning, http://gis.planning.lacounty.gov/GIS-NET3_Public/Viewer.html, accessed March 2018.
⁹ United States Fish and Wildlife Service Critical Habitat Portal, <https://ecos.fws.gov/ecp/report/table/critical-habitat.html> accessed March 2018.
¹⁰ Los Angeles County Department of Regional Planning, http://gis.planning.lacounty.gov/GIS-NET3_Public/Viewer.html, accessed March 2018.
¹¹ United States Fish and Wildlife Service Critical Habitat Portal, <https://fws.maps.arcgis.com/home/webmap/viewer.html?useExisting=1>, accessed March 2018.

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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 associated with the Project that will have a significant effect on the environment. The Project will require ground disturbance associated with foundation and utility installation. 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. Project-related activities requiring import or export of soils and materials, also require notifying OEHS 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.¹² Furthermore, as set forth in standard conditions of approval SC-CUL-13, SC-CUL-15, SC-CUL-18, and SC-CUL-19 of the Program EIR,¹³ 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.¹⁴ Lastly, any construction and demolition waste shall be recycled to the maximum extent feasible per SC-USS-1 of the Program EIR.¹⁵ 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 is the State Route 2 (SR2), which is located more than 16 miles north of the nearest Campus (Main Street ES).¹⁶ Therefore, the Project will not result in damage to scenic resources or similar resources within a highway that is 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 which are not included on any list compiled pursuant to Section 65962.5 of the Government Code.¹⁷ 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.*

Corona Avenue ES was originally opened in 1926 and therefore meets the 45-year age criterion for consideration as a historic resource. A Historic Resources Survey and Evaluation for this Campus was conducted and found

¹² LAUSD OEHS, "Section 01 4524 Environmental Import/Export Material Testing" http://www.laschools.org/documents/file?file_id=219798234&show_all_versions_p=t

¹³ LAUSD OEHS, "School Upgrade Program Final Environmental Impact Report," <http://achieve.lausd.net/ceqa>, Adopted by the Board of Education on November 10, 2015

¹⁴ *Ibid.*

¹⁵ *Ibid.*

¹⁶ Los Angeles County Department of Regional Planning, http://gis.planning.lacounty.gov/GIS-NET3_Public/Viewer.html, accessed March 2018.

¹⁷ California Department of Toxic Substances Control. DTSC Databases. Available at: <http://www.dtsc.ca.gov/database/>. Accessed March 2018.

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that the school was eligible for listing in the California Register of Historic Resources (CR Status Code 3S).¹⁸ Edison MS was not found to be eligible for listing in the California Register of Historic Resources. Main Street ES requires evaluation to determine if it is eligible for the California Register of Historic Resources. The Project will not result in significant or permanent alterations, changes, removal, or adverse impacts to the significance of Corona Avenue ES or Main Street ES because the Project entails the placement of temporary interim housing in unoccupied areas on the Campus that would not adversely impact its setting.

The work involving HVAC components will consist of the removal and replacement of the existing HVAC equipment in the same location and would not otherwise alter the significance of Corona Avenue ES or Main Street ES. Therefore, the Project does not the potential to result in a substantial adverse change in the significance of a historic resource.

Although the Project does not entail components that are expected to significantly alter the Campuses, the Contractor and subcontractors shall be made specifically aware (when applicable) that the work will occur within a campus that qualifies as a historic resource. The drawings and specifications shall include (in the demolition section or other general conditions) requirements for the protection of existing elements, buildings, and structures on the campus and a POT for workers and materials consistent with SC-CUL-4.¹⁹

Prepared By:

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Signed by:



Date:

4/19/18

Robert Laughton
CEQA Officer of the Los Angeles Unified School District

¹⁸ Heumann & Associates and Anne Doehne, Science Applications International Corporation, March 2002, "Historic Schools of the Los Angeles Unified School District", a presentation prepared for LAUSD Facilities Services Division (March 2002).

¹⁹ LAUSD OEHS, "School Upgrade Program Final Environmental Impact Report," <http://achieve.lausd.net/ceqa>, Adopted by the Board of Education on November 10, 2015.