

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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CEO, District Operations & Digital Innovation

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

Project Title:

Overland Elementary School Parking and Playground Improvements

Project Location – Specific:

Overland Elementary School (ES) (Campus) is located at 10650 Ashby Avenue, Los Angeles, California, 90064. The 4.4-acre Campus is bound by Ashby Avenue to the northwest, Overland Avenue to the southwest, Northvale Road to the south and Putney Road to the east.

Project Location – City:

Los Angeles

Project Location – County:

Los Angeles

Description of Nature, Purpose, and Beneficiaries of Project:

The scope of the Overland ES Parking and Playground Improvements Project (Project) includes restroom modifications, drinking fountain replacement, landscaping, and installation of a new faculty parking lot. All improvements will be Americans with Disabilities Act (ADA)¹ compliant as mandated by the Division of State Architect (DSA).

Restroom modifications include installing grab bars in toilet stalls; removing, shifting, and installing new partitions to provide clearance for new ambulatory stalls and stall doors to swing out; and relocating wall signs. Drinking fountain replacement consists of replacing the existing drinking fountain with a new hi-lo ADA-accessible drinking fountain and replacing the ground underneath the existing fountain to ensure it is ADA-compliant. Landscaping improvements consist of removing existing debris, rocks, vegetation, asphalt and concrete, regrading surfaces, and relocating the existing

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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irrigation system. The northeast portion of the Campus will be landscaped with new low-water use shrubs and groundcovers. Following asphalt and concrete removal, the faculty parking lot area will be resurfaced with asphalt and concrete. Trees will be removed including one tree on the City of Los Angeles sidewalk. A new concrete driveway will be constructed and an ADA-accessible pedestrian gate, 8-foot high chain link fence, and two new 20-foot double swing gates will be installed. The parking areas will be restriped and reflectorized accessible parking signs will be installed.

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 Overland 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*
 - *CEQA Guidelines Section 15311 – Accessory Structures*
- 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 asphalt concrete paving for the new faculty parking lot and implementing ADA compliance improvements, including modifying the boy's and girl's restrooms, replacing the drinking fountain, restriping the parking areas and installing reflectorized accessible parking signs. 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

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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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.

The ADA compliance improvements to the restrooms and drinking fountain 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 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.

Sixteen trees with a trunk diameter greater than or equal to eight inches may be removed from the Campus for this Project. This includes six Evergreen pear (*Pyrus kawakamii*), two Chinese elm (*Ulmus parvifolia*), four Broad-leaved paperbarks (*Melaleuca quinquenervia*), and one of each of the following: Chinese privet (*Ligustrum lucidum*), Palm tree (*Washington robusta*), Prickly paperbark (*Malaleuca styphelioides*), and Chinese banyan (*Ficus microcarpa*).⁴ As documented in a tree assessment that was prepared for the Project, none of the trees being removed are historic or protected.⁵ Additional landscape improvements include planting new low-water use shrubs and groundcover and relocating the irrigation system. Therefore, the Project satisfies the requirements of CEQA Guidelines Section 15304.

Section 15311 Accessory Structures

Class 11 consists of construction or placement 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 Faculty Parking Lot area and new concrete driveway will be constructed along with an ADA-accessible pedestrian gate, 8-foot high chain link fence, and two new 20-foot double swing gates. The parking areas will be restriped and reflectorized accessible parking signs will be installed. These qualify as accessory structures. Therefore, the Project satisfies the requirements of CEQA Guidelines Section 15311.

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 Western snowy plover, located approximately 5 miles west of the Campus.⁷ The nearest Significant Ecological Area (SEA) is the Santa Monica Mountains, located approximately 5 miles northwest of the Campus.⁸ There is no suitable

⁴ LAUSD Facilities Services Division. Tree Assessment for New Parking Lot. 26 March 2018.

⁵ *Ibid.*

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

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

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

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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.

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.⁹ Compliance with the provisions of LAUSD's Program EIR will ensure that no significant impacts will result.

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 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. Although the ground disturbance will be minimal and is not expected to disturb native soil, LAUSD's Standard Conditions (SC) of Approval including SC-CUL-13, SC-CUL-15, and SC-CUL-18, that require construction activities to 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 will be incorporated, as necessary. Lastly, construction and demolition waste will be recycled to the maximum extent feasible per SC-USS-1 of LAUSD's Program Environmental Impact Report.¹⁰ Therefore, no reasonable possibility exists that the Project will 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 2.¹¹ The Campus is located approximately 19 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.

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 *Ibid.*

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

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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.¹² 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 1936, Overland ES meets the age criteria for evaluation as a historical resource pursuant to CEQA. The school was evaluated as part of a historic resource survey commissioned by the District in 2002 and assigned a California Historic Resource code 6Z,¹³ indicating the Campus was found ineligible for listing on the National Register of Historic Places, California Register, or local listing. A reconnaissance level survey conducted in June 2017 by OEHS' Historic Resource Preservation Specialist confirmed the previous finding of ineligibility. Overland 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.

Prepared By:

Cinah Daqiq
Environmental Specialist/Research Associate

Signed by:

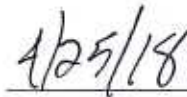


Robert Laughton,
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Date:



¹² California, State of, Department of Toxic Substances Control, Envirostor Database, <http://www.envirostor.dtsc.ca.gov/public/search.asp>, accessed March 2018.

¹³ Los Angeles Unified School District, *Final Memo, Historic Schools in LAUSD*, by Leslie Heumann and Associates, July 14, 2004.