

Los Angeles Unified School District

Office of Environmental Health and Safety

VIVIAN EKCHIAN
Interim Superintendent of Schools

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Chief Executive Officer, District Operations & Digital Innovation

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Acting Director, Environmental Health and Safety

NOTICE OF EXEMPTION

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JUN 15 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 South Beaudry Avenue
21st Floor
Los Angeles, CA 90017

Project Title:

University Pathways Medical Magnet Academy at Gompers Middle School

Project Location – Specific:

The University Pathways Medical Magnet Academy at Gompers Middle School Project (Project) will be located on the 16.1-acre Gompers Middle School (MS; Campus), located at 234 East 112th Street in the City of Los Angeles, CA. The Campus is bound by East 112th Street to the north; South San Pedro Street to the east; Imperial Highway to the south, and South Main Street to the west.

Project Location – City:

Los Angeles

Project Location – County:

Los Angeles

Description of Nature, Purpose, and Beneficiaries of Project:

The Project entails colocation of a University Pathways Medical Magnet Academy (Academy) within the existing facilities at Gompers MS. The Academy will serve students in 9th through 12th grade. The Project will include installation of an approximately 1,440 square-foot modular chemistry lab and a 480 square-foot modular restroom building and minor alterations and modifications to existing classrooms and spaces that will be used by the Academy. The Project will also include Americans with Disabilities Act (ADA) compliance improvements and upgrades to utilities and fire & life safety equipment and connections related to the colocation of the Academy.

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).¹ The Project will be constructed per Division of the State Architect (DSA) approved plans. The

¹ 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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*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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beneficiaries of this Project include the District's students and staff as well as families, school supporters and the community at large who may be served by the Academy.

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 15268²]:
- 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 15314 – Minor Addition 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 entails ADA compliance improvements and minor alterations and modifications to the existing classrooms at an existing Campus. 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 the intensity of use, nor will it increase student or staff capacity. Therefore, the Project satisfies the requirements of CEQA Guidelines Section 15301.

Section 15314 – Minor Addition 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. The addition of portable classrooms is included in this exemption.

The Project includes installation of one classroom (an approximately 1,440 square-foot modular chemistry lab) and a 480 square-foot modular restroom building. The new portable facilities will provide specialized educational space and facilities for students attending the Academy, but will not expand the capacity of the Campus. Therefore, the Project satisfies the requirements of CEQA Guidelines Section 15314.

² 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;*

The Project will occur on the existing Campus that is located within an urban-residential setting.³ The surrounding uses are primarily residential with single and multi-family homes, commercial uses, and some light industrial uses.⁴ The Campus and the surrounding area have not been designated as biologically sensitive sites or locations and do not contain sensitive resources or habitat that will be impacted by the Project. The nearest sensitive environment to the Project site is the Madrona Marsh Preserve Significant Ecological Area (SEA), located approximately 8.1 miles southwest of the Campus.⁵ As such, the Project will not have the potential to impact any sensitive environments or locations.

2. *Cumulative impacts will be considerable because successive projects of the same type will occur at the same place over time;*

The Project is not expected to result in significant cumulative environmental impacts. While there will likely be routine general maintenance on the Campus, there are currently no known successive projects of the same type or scale planned for the Campus. 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 associated with the Project that will have a significant effect on the environment. 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.⁶

The Project may require ground disturbance associated with infrastructure upgrades and hardscaping. 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. If 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

³ City of Los Angeles. ZIMAS. Available at: <http://zimas.lacity.org>. Accessed March 2018.

⁴ *Ibid.*

⁵ Los Angeles County Department of Regional Planning, http://gis.planning.lacounty.gov/GIS-NET3_Public/Viewer.html. Accessed March 2018.

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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of South Coast Air Quality Management District Rule 1466, and other applicable environmental agency rules and requirements.⁷ 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, 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.⁸ Lastly, any construction and demolition waste shall be recycled to the maximum extent feasible per standard condition of approval SC-USS-1 of the Program EIR.⁹ 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 Campus is located more than 20 miles southwest of State Route 2 (SR 2), an officially designated State scenic highway.¹⁰ The Project will not be visible from SR 2. Therefore, the Project will not result in damage to scenic resources or similar resources within a highway that is officially designated as a 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 an existing school Campus which is not included on any list compiled pursuant to Section 65962.5 of the Government Code.¹¹ 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.*

Gompers MS was opened in 1937.¹² The original buildings in the northeastern area of the Campus are eligible for listing in the National Register of Historic Places and the California Register of Historic Resources and LAUSD considers it a historical resource for the purposes of CEQA.¹³

The Project entails ADA compliance upgrades and the placement of portable classrooms in unoccupied areas of the Campus away from the historic core. A *Secretary of the Interior's Standards for Rehabilitation*¹⁴ conformance review was completed by OEHS' Historic Preservation Specialist¹⁵ 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 result of this analysis indicates that the proposed Project conforms to the *Secretary's Standards*. This determination confirms that the Project satisfies the requirements specified in CEQA Guidelines Section 15064.5(b)(3), that the Project will not be expected to materially impair the significance of the historical resource and as a result, will not result in an impact to the environment. Should the scope of the

⁷ LAUSD OEHS, "Section 01 4524 Environmental Import/Export Materials Testing", http://www.laschools.org/documents/file?file_id=219798234&show_all_versions_p=t

⁸ LAUSD OEHS, "School Upgrade Program Final Environmental Impact Report," <http://achieve.lausd.net/ceqa>, Adopted by the Board of Education on November 10, 2015.

⁹ *Ibid.*

¹⁰ Los Angeles County Department of Regional Planning, http://gis.planning.lacounty.gov/GIS-NET3_Public/Viewer.html. Accessed March 2018.

¹¹ California Department of Toxic Substances Control. DTSC Databases. Available at: <http://www.dtsc.ca.gov/database/>. Accessed March 2018.

¹² LAUSD. Facilities Services Division. Available at: <http://www.laschools.org/new-site/>. Accessed January 2018.

¹³ LAUSD. 2018. Historic Resources Inventory. Los Angeles, CA.

¹⁴ U.S. Department of the Interior, "The Secretary of the Interior's Standards for the Treatment of Historic Properties", <https://www.nps.gov/tps/standards/treatment-guidelines-2017.pdf>.

¹⁵ LAUSD OEHS, "SECRETARY OF THE INTERIOR'S STANDARDS FOR REHABILITATION REVIEW, Gompers Middle School – Portable Building and ADA Compliance Improvements," April 24, 2018.

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Project be altered from the components that are described above, District procedures require 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.

Although the Project does not entail components that are expected to significantly alter the Campus, the contractor and subcontractors shall be made specifically aware that the work will occur within a Campus that qualifies as a historical resource. Accordingly, 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 path of travel for workers and materials consistent with SC-CUL-4 of the Standard Conditions.¹⁶

Prepared By:

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Signed by:



Carlos A. Torres
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Phone and Email:

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Date:

5/15/18

¹⁶ LAUSD OEHS, "School Upgrade Program Final Environmental Impact Report," <http://achieve.lausd.net/ceqa>, Adopted by the Board of Education on November 10, 2015.