

# Los Angeles Unified School District

## Office of Environmental Health and Safety

AUSTIN BEUTNER  
Superintendent of Schools

DIANE PAPPAS  
Chief Executive Officer, District Operations & Digital Innovation

CARLOS A. TORRES  
Director, Environmental Health and Safety (Acting)

### NOTICE OF EXEMPTION

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**ORIGINAL FILED**

JUN 07 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  
21<sup>st</sup> Floor  
Los Angeles, CA 90017

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**Project Title:**

Delevan Drive Elementary School – DOH Removal and Replacement

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**Project Location – Specific:**

The Delevan Drive Elementary School – DOH<sup>1</sup> Removal and Replacement (Project) will be located on the 4.5-acre Delevan Drive Elementary School (ES) campus. Delevan Drive ES is located at 4168 West Avenue 42 in the City of Los Angeles. The campus is bordered by Yosemite Way to the north, Delevan Drive and residences to the east, West Avenue 42 to the south, and Wawona Street to the west (which is immediately west of the Glendale Freeway 2). The surrounding neighborhood is mostly comprised of single-family residential homes.

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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 Project will consist of two distinct construction phases that are referred to as Package I and Package II. Package I will entail the removal of two DOH portable buildings containing 4 classrooms. Package I will provide 4 classrooms and include remodeling the existing portable sanitary building for temporary occupancy in the 4<sup>th</sup> quarter (Q4) of 2018. Package II will entail the removal of seven non-DOH portable buildings on the campus (consisting of a total removal of 15 classrooms and 2 sanitary buildings) and removal of a lunch shelter and food service support building. Package II will also entail construction of a permanent 15 classroom building with support spaces, installation of 11 temporary interim portable classrooms during construction; and construction of a new food service facility in Q3 of 2022. The Project will also include infrastructure upgrades as required to support the new facilities, restoration of landscape, hardscape, and the playground areas where the portable buildings will be removed and Americans with Disabilities Act (ADA)/path of travel upgrades will be completed as necessary.

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<sup>1</sup> DOH- Department of Housing

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Pre-construction activities began in the 4th quarter of 2017 and are expected to end in the 4th quarter of 2019 (including Division of State Architect [DSA] review and approval). Construction activities are anticipated to begin as early as Q4 2018 and are expected to be complete by Q3 2022. No increase in student enrollment is expected as part of this Project.

The Project will be constructed per DSA-approved design specifications. 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>2</sup> which was completed in compliance with the California Environmental Quality Act (CEQA), and the ADA compliance. LAUSD's standard conditions, guidelines, and practices are designed to be incorporated into the Project design in order to avoid or limit potential adverse impacts associated with the District's projects. The beneficiaries of this Project include the District's students and staff as well as 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).

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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>3</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 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 construction of a new building, site improvements, and minor alterations such as: ADA upgrades, removal of portable buildings, and the installation of landscaping on an existing campus. The Project will not result in the growth of student enrollment or capacity of the student population or campus. The Project will be constructed completely within the boundaries of the existing campus and will not require or result in the expansion of use beyond the campus. The Project will replace portable buildings that will be removed from the campus. The remaining campus will not be

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<sup>2</sup> LAUSD. 2015. School Upgrade Program Final Environmental Impact Report, <http://achieve.lausd.net/ceqa>. Adopted by the Board of Education on November 10, 2015.

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

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adversely impacted or altered as a result of the Project. Therefore, the Project satisfies the requirements of CEQA Guidelines Section 15301.

#### 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 10 classrooms, whichever is less. The addition of portable classrooms is included in this exemption.

The Project entails demolition of nine portable buildings, construction of one new 15 classroom building, and related improvements on an existing campus. The Project is not expected to result in an increase in student enrollment and will not add any additional classrooms to the campus. The 15 new classrooms will replace the 15 classrooms located in the portable buildings that will be demolished (4 classroom as part of Phase I activities and 11 classrooms as a part of the Phase II activities). The number of classrooms on the campus will remain the same following completion of the Project. No additional classrooms are proposed as a part of the Project. Therefore, the Project satisfies the requirements of CEQA Guidelines Section 15314.

#### 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 an existing campus that is located within an urban-residential setting. The campus is bordered by residences, residential streets, and Glendale Freeway 2.<sup>4</sup> Neither the campus nor the immediate surrounding area have been designated as biologically sensitive sites or locations and they do not contain sensitive resources or habitat that will be impacted by the Project.<sup>5</sup> The nearest critical habitat is designated as such for the coastal California gnatcatcher (*Poliophtila californica californica*) and is located approximately 10 miles southeast of the campus.<sup>6</sup> 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 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 and at the same place over time.

<sup>4</sup> City of Los Angeles. ZIMAS. Available at: <http://zimas.lacity.org/>. Accessed June 2018.

<sup>5</sup> US Fish and Wildlife Service. FWS Maps. Available at: <https://ecos.fws.gov/>. Accessed June 2018.

<sup>6</sup> Ibid.

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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 and soil excavation associated with construction of the new building, installation of utility lines, installing landscaping, and replacing asphalt. Therefore, consideration must be given to the management of excavated soil. LAUSD will prepare a Preliminary Environmental Assessment-Equivalent (PEA-E) and complete soil sampling for chemicals of potential concern: lead, arsenic, and organochlorine pesticides (OCPs). Due to the location of the campus in an area that is designated as a high radon zone, LAUSD will also incorporate radon design standards into the plans for the Project.<sup>7</sup> Construction or earthmoving activities that require import or export of soils and materials will require oversight by LAUSD's Office of Environmental Health & Safety (OEHS) to ensure that these activities are conducted in compliance with the requirements of District Specification 01 4524 and the applicable environmental agency rules and requirements.

LAUSD will ensure that all construction related activities comply with the applicable LAUSD Standard Conditions of Approval (SCs) which include but are not limited to:<sup>8</sup> SC-USS-1, which requires that any construction waste will be recycled to the maximum extent feasible.<sup>9</sup> Furthermore, as set forth in SC-CUL-13, SC-CUL-15, SC-CUL-18,<sup>1</sup> 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 and/or archaeological resources), tanks or seepage pits or stained/odoriferous soils.<sup>10</sup> 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 Delevan Drive ES campus is located more than 7 miles south of State Route 2 (SR 2), the officially designated State scenic highway.<sup>11</sup> 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.<sup>12</sup> Therefore, the Project will not have an impact related to being located on a hazardous waste site.

<sup>7</sup> LAUSD. 2016. Radon Zone Map. Based in part off information provide California Department of Public Health (CDPH). 2016. Indoor Radon Program (2/26/16).

<sup>8</sup> LAUSD. 2015. 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.

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

<sup>11</sup> California Department of Transportation. California Scenic Highway Mapping System. Available at: [http://www.dot.ca.gov/hq/LandArch/16\\_livability/scenic\\_highways/index.htm](http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/index.htm). Accessed June 2018.

<sup>12</sup> California Department of Toxic Substances Control. DTSC Databases. Available at: <http://www.dtsc.ca.gov/database/>. Accessed June 2018.

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6. *The Project may cause a substantial adverse change in the significance of a historic resource.*

The Delevan Drive ES campus contains buildings that were constructed or placed on the campus between 1949 and 1997. The core campus entails three permanent classroom buildings. The original school building was removed in 1974 for the construction of a new structure, the main administrative and classroom building. Twelve portable buildings have been placed on campus over the years and were previously a part of the previous site use, the Delevan Drive Science Center.<sup>13</sup> The campus was surveyed by the District's Historic Resources Specialist in 2017 and was determined not to be an eligible historic resource.<sup>14</sup> Specifically, the District assigned the campus a California Historical Resources Status Code of 6Z, noting that the campus was found to be ineligible for the National Register of Historic Places, California Register of Historic Resources, or local designation through survey evaluation.<sup>15</sup> As such, the Project does not have the potential to cause a substantial adverse change to a historic resource.

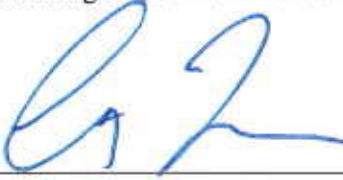
Prepared By:

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Signed by:



Date:

6/5/2018

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

<sup>13</sup> LAUSD. 2012. Delevan Drive Elementary School: Pre-Planning Survey. Los Angeles, CA.  
<sup>14</sup> LAUSD. 2018. Historic Resources Inventory. Los Angeles, CA.  
<sup>15</sup> LAUSD. 2018. Historic Resources Inventory. Los Angeles, CA.