

Los Angeles Unified School District

Office of Environmental Health and Safety

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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:

Venice High School Auditorium Repairs

Project Location – Specific:

The Venice High School Auditorium Repair Project (Project) will be located on the Venice High School campus. Venice High School is located at 13000 West Venice Boulevard, in the City of Los Angeles, California. The campus is bound on the northwest by Venice Boulevard, on the northeast by residential properties which face Lyceum Avenue, on the southeast by Zanja Street, and on the southwest by Walgrove Avenue. The Project will specifically occur within the Assembly Hall (Auditorium), which is located in the northernmost portion of the campus.

Project Location – City:

Los Angeles

Project Location – County:

Los Angeles

Description of Nature, Purpose, and Beneficiaries of Project:

The Venice High School Auditorium (Auditorium) was constructed in 1936 and has been identified as a contributor to the eligibility of Venice High School as a historical resource.¹ The interior of the Auditorium ceiling includes original character-defining wood decorative ceiling beams (including corbels), wood decorative crown moldings, and decorative plaster cornice around its perimeter. These features are damaged and appear to be failing (creating a potential safety hazard) in the Auditorium. As a result, the Auditorium is currently closed until the Los Angeles Unified School District (LAUSD or District) determines that the Auditorium is safe to occupy.

In 2016, a new Heating, Ventilation, and Air Conditioning (HVAC) system was installed in the Auditorium. It was during the installation of the HVAC system (which required work on the roof and ceiling) that District staff observed damage to

¹ LAUSD. 2015. Character-Defining Features Memorandum (CDFM) for Venice High School, 13000 Venice Boulevard, Los Angeles, California, 90064. Prepared by PCR Services Corporation. Los Angeles, CA.

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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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the decorative ceiling crown moldings, cornice, and beams. An initial historic preservation assessment was completed to assess the condition of these historic ceiling features and to provide recommendations for stabilizing, repairing, and protecting them from further damage associated with future movement or vibration in the Auditorium.²

The Project will entail the preservation of crown moldings, cornice, and beams which are character-defining features of the Auditorium ceiling. Specifically, the Project will repair damaged historic material and selectively replace the crown molding in-kind throughout the entire Auditorium. Both old and new crown molding sections will be anchored to the walls with a modern fastening system approved by the Division of State Architect (DSA). The repair efforts will preserve the crown moldings, beams, and corbels in a manner consistent with the *Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings* (SOI Standards).³ The interior of the Auditorium will also be painted as a part of this Project. The preservation work will be completed by a qualified historic preservation contractor.

Finally, the Auditorium ceiling has known asbestos containing materials (ACM) and requires the services of a certified asbestos abatement contractor. The preservation activities require disturbing ceiling areas that contain (ACM) and lead; as such, the Project will require asbestos and lead abatement prior to and concurrent with the Project. The original paint used for the historic decorative features contains lead paint. The asbestos and lead abatement associated with this Project will be completed prior to the initiation of the historic restoration and will be managed by LAUSD's Facilities Environmental Technical Unit.⁴ The Project is anticipated to begin by Q4 2018 and will be complete within approximately 12 months.

The beneficiaries of this Project include the students, faculty, staff, families, school supporters, and the community at large who may request access to the Auditorium 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 15268⁵]:
- 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 15330 – Minor Actions to Prevent, Minimize, Stabilize, Mitigate or Eliminate the Release or Threat of Release of Hazardous Waste or Hazardous Substances*
 - *CEQA Guidelines Section 15331 – Historical Resource Restoration/Rehabilitation*
- Statutory Exemption:

² LAUSD. 2016. Historic Preservation Consultation for Venice High School Auditorium, 13000 Venice Boulevard, Los Angeles, California. Prepared by ESA. Los Angeles, CA.

³ National Park Service, Department of the Interior, Washington, DC. 1995. The Secretary of the Interior's Standards for Rehabilitation, with Guidelines for Rehabilitating, Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings.

⁴ An on-call abatement contractor will also be available throughout the duration of the restoration efforts.

⁵ CEQA Guidelines can be found at California Code of Regulations Title 14, Chapter 3, Section 15000 - Section 15387.

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Reasons why project is exempt:

Section 15330 – Minor Actions to Prevent, Minimize, Stabilize, Mitigate or Eliminate the Release or Threat of Release of Hazardous Waste or Hazardous Substances

Class 30 consists of any minor cleanup actions taken to prevent, minimize, stabilize, mitigate, or eliminate the release or threat of release of a hazardous waste or substance which are small or medium removal actions costing \$1 million or less.

The Project will entail asbestos and lead abatement efforts that will prevent the release of hazardous substances (asbestos and lead). The implementation of these minor clean-up efforts will cost less than \$50,000. Therefore, the Project meets the requirements of CEQA Guidelines Section 15330 (Class 30).

Section 15331 – Historical Resource Restoration/Rehabilitation

Class 31 consists of projects limited to maintenance, repair, stabilization, rehabilitation, restoration, preservation, conservation or reconstruction of historical resources in a manner consistent with the *Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings* (1995), Weeks and Grimmer.

The Project consists of preservation work that will be completed by a qualified historic preservation contractor in a manner consistent with the SOI Standards.⁶ The District has retained the services of a qualified historic preservation team to monitor the preservation work and to ensure compliance with the SOI Standards. The appointed team exceeds the Secretary of the Interior's Professional Qualifications Standards in history, architectural history and historic architecture, and has the necessary knowledge and experience to ensure conformance with the SOI Standards and the application of the State Historic Building Code on District properties. The Project is restricted to the preservation of the ceiling's crown moldings, cornice, and beams inside the perimeter of the Auditorium followed by painting on the interior. No other work affecting features on the interior or exterior of the Auditorium are included in this Project. Therefore, the Project meets the requirements of CEQA Guidelines Section 15331 (Class 31).

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. Venice High School is primarily surrounded by residential properties with commercial properties located to the north/northwest. The campus has not been designated as a biologically sensitive site or location and does not contain sensitive resources or habitat that will be impacted by the Project.⁷ The Project will be restricted to the interior of the Auditorium. No trees, vegetation, or other potentially biological or sensitive environments or locations will be disturbed, removed, or otherwise directly or indirectly impacted by this Project. As such, the Project will not impact sensitive environments or locations.

⁶ National Park Service, Department of the Interior, Washington, DC. 1995. *The Secretary of the Interior's Standards for Rehabilitation, with Guidelines for Rehabilitating, Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings.*

⁷ City of Los Angeles. ZIMAS. Available at: <http://zimas.lacity.org/>. Accessed June 2017.

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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. As an active school campus, it is anticipated that projects such as maintenance activities or upgrades will occur on the campus in the future. There is an ongoing soil remediation and lunch shelter construction effort that began on the campus in the summer of 2017. These activities are expected to be complete by the time the Project is initiated. The Project consists of interior preservation work. The Project will be isolated from the soil remediation and lunch shelter construction which are occurring in the center part of the campus. Additionally, a campus-wide comprehensive modernization project is scheduled to begin by Q4 of 2018 and continue through Q4 of 2020. While the Project schedule may overlap with these efforts, the Project will not share the same laydown/storage space or access to the campus as these efforts and as a historic restoration and repair effort in the Auditorium, it constitutes a different scope of work than the proposed upgrades associated with the other projects on the campus. While exterior painting and accessibility upgrades to the Auditorium were included in the comprehensive modernization, no interior preservation work was included in the scope of the comprehensive modernization project. This Project will not result in any operational impacts or any significant impacts even when considered alongside the soil remediation activities and lunch shelter construction or the comprehensive modernization project. There are no other 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 and 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. No ground disturbance is required as a part of this effort because the restoration activities will occur on the ceiling of the Auditorium. As previously noted, the Auditorium ceiling has known ACM and lead, and requires the services of a certified asbestos and lead abatement contractor. The scope of the asbestos and lead abatement contractor is included as a part of the Project and will be managed by LAUSD's Facilities Environmental Technical Unit (FETU). Compliance with asbestos-related regulations and requirements is the responsibility of FETU, which (1) identifies ACM, (2) abates ACM (including repair and removal of asbestos), and (3) prepares project-specific contract specifications and inspections. FETU will be responsible for ensuring the safe removal of potential ACM and lead that may be encountered during the restoration efforts.

LAUSD maintains a complete protocol for the handling of ACMs, (including required procedures whenever ACM would be disturbed), in compliance with federal and State regulations including but not limited to: Cal/OSHA General Industry Safety Orders Article 4, Section 1529; Title 40, Code of Federal Regulations, Part 61, Subparts A and B;⁸ Federal Regulations FED/OSHA 1926.1101; Cal/OSHA General Industry Safety Orders Part 1532.1, the Code Federal Regulations for waste disposal (Environmental Protection agency), all recommended abatement method described by U.S. Department of Housing and Urban Development (HUD); LAUSD Facilities School Maintenance and Operations Repair & Construction Safety Standards dated February 28, 2013; LAUSD Office of the Inspector General, Report of Audit, Asbestos Technical Unit dated October 2, 2001; and Facilities Services Division, Asset Management: Guide Specifications - Divisions 02 – 25, Specifications - Division 13 (Special Construction), § 13280 Asbestos Abatement & Asbestos Related Disturbance dated November 21, 2003.⁹

⁸ Asbestos National Emission Standards for Hazardous Air Pollutants.

⁹ All of the referenced District specifications are available online at: http://www.laschools.org/fcs/cc/lausd-bidding/?folder_id=179552

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The Project will also comply with LAUSD's Standard Conditions of Approval which include but are not limited to: SC-USS-1 of LAUSD's Program Environmental Impact Report (Program EIR),¹⁰ which requires that any construction waste will be recycled to the maximum extent feasible.¹¹ The Project will be located in a significant historic building and as such consideration must be given to the design and implementation of the Project through the incorporation of SC-CUL-3 and SC-CUL-6.¹² 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;*

Venice High School is located approximately 21 miles southwest of State Route 2 - Angeles Crest Highway (SR2), an officially designated State scenic highway.¹³ The campus is not visible from SR2 so views from SR2 would not be impacted by the interior preservation work that will occur on the campus. 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.¹⁴ 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.*

Venice High School opened in 1911. The primary period of significance for Venice HS is between 1934 and 1937 when the campus was rebuilt in the PWA Moderne style. Venice High School was assigned a California Historical Resource Status Codes of "3S" and "3CS," which means the subject school appears eligible for National Register of Historic Places and California Register of Historic Resources through survey evaluation.¹⁵ A 2002 survey evaluation of the campus identified the Auditorium as a character-defining building.¹⁶ In 2015, a Character-Defining Features Memorandum (CDFM) was prepared for the campus.¹⁷ The CDFM described the Auditorium as a significant (primary) character-defining building on the campus and stated that as such, it contributes to the eligibility of Venice High School as a historical resource.¹⁸ The District has retained the services of a qualified historic preservation team that exceeds the SOI Professional Qualifications Standards to oversee, review, and monitor the work completed by the historic restoration contractor to ensure that the Project is in conformance

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

¹¹ LAUSD OEHS, "School Upgrade Program Final Environmental Impact Report," <http://achieve.lausd.net/ceqa>, Adopted by the Board of Education on November 10, 2015.

¹² Ibid.

¹³ California Department of Transportation. California Scenic Highway Mapping System. Available at: http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/index.htm. Accessed June 2017.

¹⁴ California Department of Toxic Substances Control. DTSC Databases. Available at: <http://www.dtsc.ca.gov/database/>. Accessed June 2017.

¹⁵ LAUSD. 2015. Character-Defining Features Memorandum (CDFM) for Venice High School, 13000 Venice Boulevard, Los Angeles, California, 90064. Prepared by PCR Services Corporation. Los Angeles, CA. Referencing the Phase I Getty Survey conducted on March 15, 2002.

¹⁶ Ibid.

¹⁷ Ibid.

¹⁸ Ibid.

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with the SOI Standards.¹⁹ This team will also work directly with the District's Historic Preservation Specialist to further ensure the necessary SOI compliance associated with this Project.

In accordance with CEQA Guidelines Section 15064.5(b)(3), a project that has been determined to conform with the SOI 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 SOI Standards, the project can, in most cases, be considered categorically exempt from CEQA (14 CCR Section 15331) and qualify for a Notice of Exemption.

As a preservation effort, this Project is intended to preserve damaged character-defining features in the ceiling of the Auditorium and to protect these features from future damage. The Project will conform with the SOI Standards and as such, does not have the potential to cause a substantial adverse change to a historic resource.

Prepared By:

Eimon Smith
CEQA Project Manager/Contract Professional

Signed by:

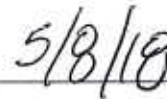


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¹⁹ National Park Service, Department of the Interior. 1995. The Secretary of the Interior's Standards for Rehabilitation, with Guidelines for Rehabilitating, Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings Washington, DC.