

Los Angeles Unified School District

Office of Environmental Health and Safety

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Superintendent of Schools

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MAR 05 2020

NOTICE OF EXEMPTION

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

Project Title:

Nature Explore Projects at Nine LAUSD Campuses (Bundle 2)

Project Location – Specific:

- 96th Street Elementary School, 1471 E 96th Street, Los Angeles, CA 90002
- 112th Street Elementary School, 1265 E 112th Street, Los Angeles, CA 90059
- Compton Avenue Elementary School, 1515 East 104th Street, Los Angeles, CA 90002
- Gledhill Early Education Center, 16058 Gledhill Street, Los Angeles, CA 91343
- Locke Early Education Center, 320 E 111th Street, Los Angeles, CA 90061
- Murchison Early Education Center, 1537 Murchison Street, Los Angeles, CA 90033
- Normandie Early Education Center, 4407 Raymond Avenue, Los Angeles, CA 90037
- Normont Early Education Center, 25028 Petroleum Avenue, Los Angeles, CA 90710
- Weigand Elementary School, 10401 Weigand Avenue, Los Angeles, CA 90002

Project Location – City:

Los Angeles

Project Location – County:

Los Angeles

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Description of Nature, Purpose, and Beneficiaries of Project:

The proposed Nature Explore projects (Project) will create field-tested, research-based outdoor learning spaces that provide learning opportunities and support children's interaction with the natural world at nine Los Angeles Unified School District (LAUSD or District) school campuses: 96th Street Elementary School (ES), 112th Street ES, Compton Avenue ES, Gledhill Early Education Center (EEC), Locke EEC, Murchison EEC, Normandie EEC, Normont EEC, and Weigand ES (Campuses). The outdoor learning spaces will be divided into distinct activity areas to provide a wide-ranging mix of educational activities that support children with a variety of needs and learning styles. Each Project site will be individually designed, but will include a combination of the following components:

Recommended Areas:

- Entry
- Open area for large-motor activities
- Climbing /crawling area
- "Messy materials" area
- Nature art area
- Music and movement area
- Garden and/or pathway through plantings
- Gathering area (a separate area, or one of the other large areas could be used as gathering area)
- Storage area (this could be included within each area as needed)

Supplemental Areas:

- Water area
- Dirt-digging area
- Sand area
- Area for swings or other dynamic equipment

The Project includes creating targeted outdoor learning environments, as well as, holistically planning the outdoor classroom experience and providing logical and accessible spaces. The scope also includes, but is not limited to the following: an accessible path of travel from public right of way and/or from parking area (as necessary), accessible parking, accessible path of travel to the Main Office, site signage, accessible restrooms, accessible drinking fountains, any fire/life safety upgrades including updating of the fire alarm systems; and minor structural improvements where required.

The Project will be constructed per DSA approved plans. The Project will be implemented per all applicable local and State regulations, as well as all District Standards and Specifications; such as the updated Standard Conditions of Approval for District Construction, Upgrade, and Improvements Projects (SCs) as adopted by the Board of Education in February 2019.¹ The primary purpose of the Project is to provide outdoor learning experiences that provide learning opportunities and support children's interaction with the natural world. The Project will not cause an increase in student capacity or enrollment and will not result in an increase in the intensity of use. The beneficiaries of the Project include students and staff at each of the respective schools and the community at large who may request access to the facilities and grounds of the campuses pursuant to the Civic Center Act (CA Ed. Code Sections 38130 - 38139).

¹ LAUSD OEHS, "Standard Conditions of Approval for District Construction, Upgrade, and Improvements Projects," Adopted by the Board of Education on February 5, 2019.



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 15303 – New Construction or Conversion of Small 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 installation and/or replacement of the structures and features of the Nature Explore Classrooms within existing outdoor areas at the nine Campuses would constitute operation, repair, maintenance and minor alteration of existing public structures involving no expansion of the facilities' use.

The proposed Project components would involve minor alterations to existing campuses and would occur within the area occupied by existing facilities at the Project sites. The Project components would not present a new or expanded use of the Project sites. Therefore, the Project constitutes minor alterations to existing school sites that result in no expansion of use and meets the requirements of CEQA Guidelines Section 15301.

Section 15303 New Construction or Conversion of Small Structures

Class 3 consists of construction and location of limited numbers of new, small facilities or structures; installation of small new equipment and facilities in small structures; and the conversion of existing small structures from one use to another where only minor modifications are made to the structure.

The installation and/or replacement of structures and features of the Nature Explore Classrooms within existing outdoor areas at the nine Campuses would constitute operation, repair, maintenance and minor alteration of existing campuses involving no expansion in enrollment or of the facilities' use. Therefore, the Project satisfies the requirements of CEQA Guidelines Section 15303.

² CEQA Guidelines can be found at California Code of Regulations Title 14, Chapter 3, Section 15000 - Section 15387.



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 they would not violate any of the exceptions, as described below.

1. *The project would occur in certain specified sensitive environments or locations;*

The Project sites are fully developed Campuses within urbanized communities.³ None of the Project sites 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. The Project will be contained exclusively within the boundaries of the Campuses. The nearest Significant Ecological Area is the Harbor Lake Regional Park located approximately 0.2 miles east of Normont EEC.^{4,5} As such, the Project will not impact sensitive environments or locations.

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

The Campuses are active school sites and there will likely be ongoing maintenance activities and minor projects on the Campuses to keep the schools operational. As the Project will not result in any lasting adverse impacts once construction of the Project is complete, the Project would not contribute to cumulative impacts when considered with expected successive projects.

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 that would have a significant effect on the environment. The removal of trees is not anticipated as part of the proposed scope of work. However, should the Project be altered 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 of Approval (SC) SC-BIO-3 of the Program EIR.^{6,7}

The Project may include minor ground-disturbing activities. 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. 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 of South Coast Air Quality Management District Rule 1466, and other applicable environmental agency rules and requirements.⁸ Furthermore, as set forth in SC-CUL-6, SC-CUL-7, SC-CUL-9, SC-CUL-10, and SC-CUL-11 of

³ City of Los Angeles Planning Department, *Zoning and Information Management System*, <http://zimas.lacity.org/>, accessed February 2020.

⁴ United States Fish and Wildlife Service Critical Habitat Portal, <https://ecos.fws.gov/ecp/report/table/critical-habitat.html> accessed February 2020.

⁵ Los Angeles County Department of Regional Planning, http://gis.planning.lacounty.gov/GIS-NET3_Public/Viewer.html, accessed February 2020.

⁶ LAUSD OEHS, "Standard Conditions of Approval for District Construction, Upgrade, and Improvements Projects," Adopted by the Board of Education on February 5, 2019.

⁷ LAUSD OEHS, "Tree Trimming and Removal Procedure", <http://achieve.lausd.net/ceqa>.

⁸ LAUSD OEHS, "Section 01 4524 Environmental Import/Export Materials Testing", http://www.laschools.org/documents/file?file_id=219798234&show_all_versions_p=t

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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.⁹ Lastly, any construction and demolition waste shall be recycled to the maximum extent feasible per SC-USS-1 of the Program EIR.¹⁰ Therefore, the Project will 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 state scenic highway;*

The closest designated state scenic highway to any of the Project sites is State Route 2 (SR 2), which is located approximately 11.5 miles north of Murchison EEC.¹¹ The Project will not be visible from SR 2. Therefore, the Project would not result in damage to scenic resources or similar resources within a highway 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*

None of the Project sites are located on sites that are included on any list compiled pursuant to Section 65962.5 of the Government Code.¹² Therefore, the Project will 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 historical resource.*

The LAUSD Historic Preservation Specialist determined that these nine Campuses are ineligible as historic resources.¹³ Research did not reveal any significant association between the nine Campuses and the development of alternative educational approaches or any other historical events or personages significant to national, State, or local history. Therefore, the Project will have no impact to a historic resource.

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 February 2020.

¹² http://www.dtsc.ca.gov/SiteCleanup/Cortese_List.cfm, accessed February 2020.

¹³ LAUSD. 2020. Historic Resources Inventory. Los Angeles, CA.

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Signed by:



Carlos A. Torres,
CEQA Officer of the Los Angeles Unified School District

Date:

2/24/20
