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:
Palms Middle School Paving Project

Project Location – Specific:
The Palms Middle School Paving Project (Project) will occur on the 15.2-acre Palms Middle School campus that is located at 10860 Woodbine Street in the City of Los Angeles (Campus). The Campus is primarily bound by Woodbine Street to the northwest/north, Glendon Avenue and residences to the northeast/east, Charnock Road to the southeast/south, and Kelton Avenue and residences to the southwest/west. The Campus is bisected by Palms Boulevard and connected by a pedestrian underpass. The Project will be located in the northwest parking area between Palms Boulevard and Westminster Avenue.

Project Location – City:
Los Angeles

Project Location – County:
Los Angeles

Description of Nature, Purpose, and Beneficiaries of Project:
The Project will consist of several remaining construction activities associated with the paving Project which was initiated at the Campus in 2016. Specifically, the Project will entail replacing an existing decomposed granite track with new decomposed granite and installing additional drainage at the existing track to increase the drainage capacity. It is also anticipated that maintenance and operations activities consisting of the replacement of an existing driveway off Palms Boulevard onto the Campus may be completed within the same construction period as the track replacement; and minor campus upgrades (e.g., the replacement of restroom doors) will be completed as a part of the Project. The Project activities will constitute an in-kind replacement and will occur within the same footprint as the existing track and driveway facilities. Construction activities associated with the track are anticipated to be complete in seven months and the driveway activities are anticipated to be complete in up to three months. The Project will not result in an increase in the student enrollment or require an alteration of the current use, function, or capacity of the existing facilities or Campus.

Doc# 682794
333 South Beaudry Avenue, 21st Floor, Los Angeles, CA 90017 • Telephone (213) 241-3199 • Fax (213) 241-6816

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.
The Project will be implemented pursuant to all applicable State, federal, and local regulations and all applicable LAUSD specifications, standards, and/or guidelines, including those in compliance with the California Environmental Quality Act (CEQA) and the updated Standard Conditions of Approval for District Construction, Upgrade, and Improvements Projects as adopted by the Board of Education in February 2019.¹ LAUSD’s standard conditions, design guidelines, and best management 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 are the Palms Middle School (Palms MS) 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 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)]:
- [x] Categorical Exemption (PRC Section 21084; CEQA Guidelines Sections 15300 -15333):
  - CEQA Guidelines Section 15301 – Existing Facilities
  - CEQA Guidelines Section 15302 – Replacement or Reconstruction
- [ ] 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 consists of minor upgrades to the existing Campus. Specifically, the Project will consist of in-kind construction and minor upgrades within the existing Campus. The track and driveway will be replaced in the same footprints as the existing track and driveway facilities on the Campus. Replacement of these facilities will not present a new or expanded use of the Campus. Therefore, the Project fulfills the requirements of CEQA Guidelines Section 15301.

---

² CEQA Guidelines can be found at California Code of Regulations Title 14, Chapter 3, Section 15000 – Section 15387.
Section 15302 - Replacement or Reconstruction

Class 2 consists of replacing or reconstructing 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.

Consistent with Section 15302(a) of the CEQA Guidelines, the Project will include the replacement of existing facilities within the Campus. An existing track, driveway, and Campus fixtures will be replaced in the same locations. The Project will not result in an increase or alteration of the current use, function, or capacity of the existing facilities or Campus. The replacement facilities and upgraded fixtures will serve the same purpose and capacity as the existing facilities that are being replaced. Therefore, the Project fulfills the requirements of CEQA Guidelines Section 15302.

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 described below.

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

The Project will be located on a fully developed campus that is situated within a highly urbanized community. The Campus has not been designated as a sensitive or biological site and no sensitive or biological resources have been identified on the Campus that will be impacted by the Project. The Project will consist of in-kind construction to previously disturbed areas on an existing campus that is not on or within the immediate proximity of any sensitive environment. The nearest significant ecological area (SEA) consist of critical habitat designated for the Western Snowy Plover, located approximately 5.21 miles northwest of the Project site. These improvements will not require alterations, removal, destruction or any other form of impact to any sensitive or biological resources. Therefore, the Project will not have the potential to adversely impact sensitive or biological resources.

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

Currently, there are no other successive projects of the same type planned at the Campus during the same construction period. All known activities that will occur on the Campus during the same construction period have been discussed in the project description. The Project will not have the potential to result in significant impacts that will be considered cumulatively considerable. Therefore, no cumulative impacts will be expected to result from the modifications, upgrades, and improvements associated with the Project.

3. There is a reasonable possibility that the activity would have a significant effect on the environment due to unusual circumstance;

There are no known unusual circumstances that would have a significant effect on the environment. 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.

Project involves the removal of decomposed granite, asphalt, and pavement, which requires soil sampling and testing for characterization prior to removal. Excavated soils will only be reused onsite if they are placed beneath paved areas. OEHS must be notified to provide oversight of any import or export of soils and materials 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. Furthermore, as set forth in standard conditions (SCs) SC-CUL-7, SC-CUL-9, and SC-CUL-10 of the Standard Conditions of Approval for District Construction, Upgrade, and Improvements Projects as adopted by the Board of Education in February 2019, and in District protocols, 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. Lastly, any construction and demolition waste shall be recycled to the maximum extent feasible per SC-USS-1. 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 scenic highway;

The closest officially designated scenic highway is State Route 2 (SR2), which is located more than 17 miles northeast of the Campus. The Campus is not visible from SR2 and as an in-kind replacement of facilities at the Campus, the Project does not involve alterations to the Campus that would have the potential to damage scenic resources. Therefore, the Project will not be expected to 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

The Campus associated with the Project is not included on any list compiled pursuant to Section 65962.5 of the Government Code. Therefore, the Project will not be expected to result in 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.

Palms MS was originally constructed in 1949. The original campus consisted of a two-story Administration and Classroom Building, Industrial Arts Building, Cafeteria, Physical Education Building, pedestrian tunnel and a portable building. The Assembly Building was added in 1957. The remaining portable buildings were added between 1950 and 2001. LAUSD assigned the Campus a California Historic Resources status code of 3CS, noting that the Campus appears individually eligible for the California Register of Historic Resources as a result of survey evaluation.

---

6 Ibid.
7 Ibid.
12 LAUSD. 2016. Secretary of the Interior Standards Conformance Review for the Palms Middle School Minor Upgrades Project. Los Angeles, CA.
This Project will not have the potential to impact or alter a historic resource. The Project will occur in the recreational area which does not contain any historic resources and is not readily visible from the historic resources on the Campus. The Project will replace the existing facilities in-kind and would not cause a substantial adverse change in the significance of a historic resource or on any character defining features associated with this Campus.\textsuperscript{15}

Prepared By:

Eimon Smith
CEQA Project Manager/Contract Professional

Signed by: 

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

Phone and Email:

(213) 241-3417
Eimon.Smith@LAUSD.net

Date: 3/28/19

\textsuperscript{15} Ibid.