

Los Angeles Unified School District

Office of Environmental Health and Safety

AUSTIN BEUTNER
Superintendent of Schools

VIVIAN EKCHIAN
Deputy Superintendent

CARLOS A. TORRES
Director, Environmental Health and Safety

JENNIFER FLORES
Deputy Director, Environmental Health and Safety

NOTICE OF EXEMPTION

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AUG 09 2019

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:

Topanga Elementary Charter School Classroom Replacement, Paving, and Drainage Project

Project Location – Specific:

The Topanga Elementary Charter School Classroom Replacement, Paving, and Drainage Project (Project) will occur on the 12.23-acre Topanga Elementary Charter School Campus (Campus). The Campus is located at 22075 Topanga School Road in the neighborhood of Topanga and in the City of Los Angeles. The Campus is situated in a rural area and is surrounded by native vegetation in the Santa Monica Mountain Range, with some single-family residential homes east of the Campus.

Project Location – City:

Los Angeles

Project Location – County:

Los Angeles

Description of Nature, Purpose, and Beneficiaries of Project:

The Project will include the removal of two (2) Department of Housing (DOH) portable buildings consisting of four (4) classrooms and the replacement of these four (4) classrooms in two (2) refurbished portable buildings. The Project will also provide approximately 84,000 square feet of new paving in the upper play yard and the lower parking lot and provide three (3) new catch basin drains and additional site drainage. 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.

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

Doc# 705258

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.*



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 Topanga Charter Elementary School (Topanga ES) 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)]:
- Categorical Exemption (PRC Section 21084; CEQA Guidelines Sections 15300 -15333):
 - *CEQA Guidelines Section 15301 – Existing Facilities*
 - *CEQA Guidelines Section 15302 – Replacement or Reconstruction*
 - *CEQA Guidelines Section 15304 – Minor Alterations to Land*
 - *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 include the removal of two (2) Department of Housing (DOH) portable buildings consisting of four (4) classrooms and the replacement of these four (4) classrooms in two (2) refurbished portable buildings. The Project will also provide approximately 84,000 square feet of new paving in the upper play yard and the lower parking lot and provide three (3) new catch basin drains and additional site drainage. 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.

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.

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

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



Consistent with Section 15302(a) of the CEQA Guidelines, the Project will include the replacement of existing facilities within the Campus. The Project will include the removal of two (2) Department of Housing (DOH) portable buildings consisting of four (4) classrooms and the replacement of these four (4) classrooms in two (2) refurbished portable buildings. The Project will also replace approximately 84,000 square feet of paving in the upper play yard and the lower parking lot. 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 15304 – Minor Alterations to Land

Class 4 consists of minor public or private alterations in the condition of land, water, and/or vegetation which do not involve removal of healthy, mature, scenic trees except for forestry or agricultural purposes.

The Project will provide three (3) new catch basin drains and additional site drainage. The Project will not remove healthy, mature, scenic trees. Therefore, the Project fulfills the requirements of CEQA Guidelines Section 15304.

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

The Project will include the removal of two (2) Department of Housing portable buildings consisting of four (4) classrooms and the replacement of these four (4) classrooms in two (2) refurbished portable buildings. The addition does not increase original student capacity by more than 25% or ten classrooms. Therefore, the Project fulfills 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 described below.

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

The Project will be located on a fully developed campus. 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.³ 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 Braunton's milk-vetch, located approximately 2.4 miles east of the Project site.⁴ 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;*

³ City of Los Angeles. ZIMAS. Available at: <http://zimas.lacity.org>. Accessed April 2019.

⁴ United States Fish and Wildlife Service Critical Habitat Portal, <https://ecos.fws.gov/ecp/report/table/critical-habitat.html> accessed April 2019.

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Currently, there are no other successive projects of the same type planned at the Campus during the same construction period.⁵ 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. The 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.⁶ Furthermore, as set forth in standard conditions (SCs) SC-CUL-7, SC-CUL-9, SC-CUL-10, and SC-CUL-11 of the Standard Conditions of Approval for District Construction, Upgrade, and Improvements Projects as adopted by the Board of Education in February 2019,⁷ 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.⁸ Lastly, any construction and demolition waste shall be recycled to the maximum extent feasible per SC-USS-1.⁹ 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 the Topanga Canyon State Scenic Highway, a 2.5-mile segment of State Route 27 (SR27), which is located approximately 0.83 mile south of the Campus.¹⁰ The Campus is not visible from SR27 and 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*

⁵ LAUSD. Facilities Services Division, Facilities Initiatives. Available at: <http://mo.laschools.org/fis/existing-facilities/m-and-o/ef-projects/project-segments?locn=8557>. Accessed April 2019.

⁶ LAUSD OEHS, "Section 01 4524 Environmental Import/Export Materials Testing", http://www.laschools.org/documents/file?file_id=219798234&show_all_versions_p=t

⁷ LAUSD OEHS, "Standard Conditions of Approval for District Construction, Upgrade, and Improvements Projects," Adopted by the Board of Education on February 5, 2019.

⁸ *Ibid.*

⁹ *Ibid.*

¹⁰ 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 April 2019.

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The Campus associated with the Project is not included on any list compiled pursuant to Section 65962.5 of the Government Code.¹¹ 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.*

Topanga ES was originally constructed in in 1953 and 1955. The two main classroom buildings and the Administration Building were constructed in 1953, with a classroom/sanitary building and an assembly building added in 1955. The steel-reinforced red brick buildings display clean, simple lines with steep shed roofs and extensive windows typical of the Mid-Century Modern architectural style of the period. LAUSD assigned the Campus a California Historic Resources status code of 3D, noting that the Campus appears eligible for the National Register of Historic Places as a result of survey evaluation.^{12,13}

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.¹⁴

Prepared By:

Christy Wong
Assistant CEQA Project Manager/Contract Professional

Signed by:

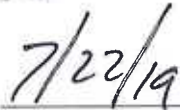


Carlos A. Torres,
CEQA Officer of the Los Angeles Unified School District

Phone and Email:

(213) 241-3394
cp-christy.wong@LAUSD.net

Date:



¹¹ California Department of Toxic Substances Control. DTSC Databases. Available at: <http://www.dtsc.ca.gov/database/index.cfm>. Accessed April 2019.

¹² Los Angeles Unified School District. 2004. *Historic Schools Survey - LAUSD*. Los Angeles, CA.

¹³ LAUSD. 2019. Secretary of the Interior Standards Conformance Review for the Topanga Elementary School DOH Portable Replacement. Los Angeles, CA.

¹⁴ Ibid.