

# Los Angeles Unified School District

## Office of Environmental Health and Safety

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Director, Environmental Health and Safety (Acting)

ORIGINAL FILED

MAY 15 2018

LOS ANGELES, COUNTY CLERK

### NOTICE OF EXEMPTION

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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:**

University Pathways Public Service Academy at Drew Middle School

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**Project Location – Specific:**

Drew Middle School (MS) (Campus) is located at 8511 Compton Avenue, Los Angeles, California 90001. The Campus is located on a 19.8-acre site bound by Compton Avenue to the east; Firestone Boulevard, residences along either side of Zamora Avenue, and Russell Elementary School to the south; residences to the west; and residences located south of East 83<sup>rd</sup> Street to the north. The surrounding area is medium density residential (12-22 dwellings per acre) with major commercial corridors along Compton Avenue and Firestone Boulevard.

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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 scope of the University Pathways Public Service Academy at Drew MS Project (Project) includes colocation of the University Pathways Public Service Academy within the existing facilities at the Drew MS Campus. The University Pathways Public Service Academy will serve students in 9<sup>th</sup> through 12<sup>th</sup> grade. The Project will include installation of a 1,440 square foot modular chemistry laboratory, 480 square foot modular restroom building and minor alterations and modifications to existing classrooms and spaces that will be used by the University Pathways Public Service Academy. The Project will also include Americans with Disabilities Act (ADA) compliance improvements and upgrades to utilities and fire & life safety equipment and connections related to the colocation of the University Pathways Public Service Academy.

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

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333 South Beaudry Avenue, 21<sup>st</sup> 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.*

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Program (Program EIR).<sup>1</sup> The Project will be constructed per Division of the State Architect (DSA) approved plans. The beneficiaries of the Project include the District's students and staff as well as families, school supporters and the community at large who may be served by the University Pathways Public Service Academy or 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 15268<sup>2</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 includes ADA compliance improvements, upgrades to utilities, life safety and fire systems equipment and connections, and minor alterations and modifications to the existing classrooms at an existing Campus. These improvements constitute minor alterations to existing public facilities. The Project will not result in the physical expansion of school facilities and will not increase the intensity of use, nor will it increase student or staff capacity. 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 ten classrooms, whichever is less.

The Project includes the installation of one classroom (a 1,440 square foot modular chemistry laboratory) and a 480 square foot modular restroom building on an existing school Campus. The new portable facilities will provide specialized educational space and facilities for students attending University Pathways Public Service Academy, but will not expand the capacity of the Campus. Therefore, the Project satisfies the requirements of CEQA Guidelines Section 15314.

<sup>1</sup> LAUSD OEHS, "School Upgrade Program Final Environmental Impact Report," <http://achieve.lausd.net/ceqa>, Adopted by the Board of Education on November 10, 2015

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

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### 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 is located on a fully developed, existing school site within a highly urbanized community.<sup>3</sup> The Campus and the surrounding area have not been designated as biologically sensitive sites or locations and do not contain sensitive resources or habitat that will be impacted by the Project.<sup>4,5</sup> The nearest Significant Ecological Area (SEA) is Puente Hills, located approximately 9.4 miles northeast of the Campus.<sup>6</sup> No impacts to sensitive environments, listed species or their habitat is expected to occur as a result of this Project.

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

As an active school site, the Campus is subject to routine maintenance and operational activities. There are no known projects of the same type and magnitude that would occur on the Campus at this time. Therefore, no cumulative impacts would occur as a result of 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. If the Project scope changes 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.<sup>7</sup>

Some minor ground-disturbing activities associated with the Project may occur. 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 excavated soils associated with earthwork activities for the Project. Excavated soils will only be reused onsite if they are placed beneath paved areas. 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<sup>8</sup>, relevant provisions of South Coast Air Quality Management District Rule 1466, and applicable environmental agency rules and requirements. Furthermore, as set forth in standard conditions of approval SC-

<sup>3</sup> City of Los Angeles. ZIMAS. Available at: <http://zimas.lacity.org>. Accessed March 2018.

<sup>4</sup> US Fish and Wildlife Service. FWS Maps. Available at: <https://ecos.fws.gov/ipac/location/index>. Accessed March 2018.

<sup>5</sup> Los Angeles County Department of Regional Planning, [http://gis.planning.lacounty.gov/GIS-NET3\\_Public/Viewer.html](http://gis.planning.lacounty.gov/GIS-NET3_Public/Viewer.html). Accessed March 2018.

<sup>6</sup> *Ibid.*

<sup>7</sup> LAUSD OEHS, "School Upgrade Program Final Environmental Impact Report," <http://achieve.lausd.net/ceqa>, Adopted by the Board of Education on November 10, 2015.

<sup>8</sup> LAUSD OEHS, "Section 01 4524 Environmental Import/Export Material Testing", [http://www.laschools.org/documents/file?file\\_id=219798234&show\\_all\\_versions\\_p=t](http://www.laschools.org/documents/file?file_id=219798234&show_all_versions_p=t)

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CUL-13, SC-CUL-15, SC-CUL-18, and SC-CUL-19<sup>9</sup> 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. Construction and demolition waste will be recycled to the maximum extent feasible per SC-USS-1 of the Program EIR.<sup>10</sup> Therefore, the Project would 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 designated scenic highway to the Project is State Route 2. The Campus is located more than 18 miles southwest of State Route 2,<sup>11,12</sup> which is a sufficient distance from this resource to be outside of the view shed and would not degrade the characteristics that contribute to its scenic eligibility. 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*

The Drew MS Campus is not included on any list compiled pursuant to Section 65962.5 of the Government Code.<sup>13</sup> 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.*

Drew MS was built in the 1960s and opened in 1963.<sup>14</sup> The earliest building was completed in 1962 and the Campus retains all of its initial permanent buildings.<sup>15</sup> The entire Drew MS is eligible for listing in the National Register of Historic Places under criterion C and the California Register of Historic Resources under criterion 3 and LAUSD considers it a historical resource for the purposes of CEQA.<sup>16</sup>

The Project entails the ADA compliance improvements and placement of portable classrooms in unoccupied areas of the Campus. A *Secretary of the Interior's Standards for Rehabilitation*<sup>17</sup> conformance review was completed by OEHS' Historic Preservation Specialist<sup>18</sup> to ensure compliance with applicable guidelines (the *Secretary's Standards* and Los Angeles Unified School District Design Guidelines and Treatment Approaches for Historic Schools). The result of this analysis indicates that the proposed Project conforms to the *Secretary's Standards*. This determination confirms that the Project satisfies the requirements specified in CEQA Guidelines Section 15064.5(b)(3), that the Project will not be expected to materially impair the significance of the historical resource

<sup>9</sup> LAUSD OEHS, "School Upgrade Program Final Environmental Impact Report," <http://achieve.lausd.net/ceqa>, Adopted by the Board of Education on November 10, 2015.

<sup>10</sup> *Ibid.*

<sup>11</sup> [http://www.dot.ca.gov/hq/LandArch/scenic\\_highways/index.htm](http://www.dot.ca.gov/hq/LandArch/scenic_highways/index.htm). October 9, 2009

<sup>12</sup> Los Angeles County Department of Regional Planning. GIS-NET3. [http://gis.planning.lacounty.gov/GIS-NET3\\_Public/Viewer.html](http://gis.planning.lacounty.gov/GIS-NET3_Public/Viewer.html). Accessed March 2018.

<sup>13</sup> California, State of, *Department of Toxic Substances Control, Envirostor Database*, <http://www.envirostor.dtsc.ca.gov/public/search.asp>, accessed March 2018.

<sup>14</sup> LAUSD. Facilities Services Division. Available at: <http://www.laschools.org/new-site/>. Accessed January 2018.

<sup>15</sup> *Ibid.*

<sup>16</sup> LAUSD. PCR Services Corporation, Historical Resources Assessment Report: Charles C. Drew Junior High School [sic], September 2014.

<sup>17</sup> U.S. Department of the Interior, "The Secretary of the Interior's Standards for the Treatment of Historic Properties", <https://www.nps.gov/tps/standards/treatment-guidelines-2017.pdf>.

<sup>18</sup> LAUSD OEHS, "SECRETARY OF THE INTERIOR'S STANDARDS FOR REHABILITATION REVIEW, Drew Middle School -- Portable Building and ADA Compliance Improvements" April 24, 2018.

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and as a result, will not result in an impact to the environment. Should the scope of the Project be altered from the components that are described above, District procedures require that OEHS must be notified immediately to ensure that these activities are conducted in compliance with the *Secretary's Standards* and would not cause a substantial adverse change in the significance of a historical resource.

Although the Project does not entail components that are expected to significantly alter the Campus, the Contractor and subcontractors shall be made specifically aware that the work will occur within a Campus that qualifies as a historical resource. Accordingly, the drawings and specifications shall include (in the demolition section or other general conditions) requirements for the protection of existing elements, buildings, and structures on the Campus and a path of travel for workers and materials consistent with SC-CUL-4 of the Standard Conditions.<sup>19</sup>

Prepared By:

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Signed by:



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Date:

5/10/18

<sup>19</sup> LAUSD OEHS, "School Upgrade Program Final Environmental Impact Report," <http://achieve.lausd.net/ceqa>, Adopted by the Board of Education on November 10, 2015.