

# Los Angeles Unified School District

## Office of Environmental Health and Safety

ALBERTO M. CARVALHO  
Superintendent

CARLOS A. TORRES  
Director, Environmental Health and Safety

ORIGINAL FILED

MAY 25 2022

JENNIFER FLORES  
Deputy Director, Environmental Health and Safety

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 S. Beaudry Avenue  
21<sup>st</sup> Floor  
Los Angeles, CA 90017

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**Project Title:**

Alexandria EEC – Nature Explore Outdoor Classroom and Campus Upgrade

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**Project Location – Specific:**

The Alexandria EEC – Nature Explore Outdoor Classroom and Campus Upgrade Project (Project) will be located on the 0.44-acre Alexandria Early Education Center (EEC) campus. Alexandria EEC is located at 4304 Rosewood Avenue in Los Angeles, California. It is bound by Rosewood Avenue to the north, North Alexandria Avenue to the east, and Alexandria Elementary School to the south and west. The Project will occur in paved and landscaped areas at the Alexandria EEC campus (Campus).

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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:**

This Project entails the conversion of approximately 8,046 square feet (sf) of existing paving and landscaping areas on the Campus into Nature Explore Outdoor Classrooms with interactive nature-based learning and activity components in distinct activity areas. The Project will also replace deteriorated heating, ventilation, and air conditioning (HVAC) units, roofing, as well completing necessary upgrades to the fire alarm system, as required by current code requirements.

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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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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 Improvement Projects as adopted by the Board of Education in February 2019 (SC).<sup>1</sup> LAUSD's SCs, 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 the Project include Alexandria EEC students, faculty, staff, families, school supporters, and the community at large who may request access to the facilities and grounds of the Campus pursuant to the Civic Center Act (CA Ed. Code Sections 38130 - 38139).

Should the Project be altered from the improvements that are described above, LAUSD's Office of Environmental Health & Safety (OEHS) must be notified immediately to ensure that these activities are conducted in compliance with the required standards.

**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 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 will convert approximately 8,046 square feet (sf) of existing paving and landscaping areas on the Campus into Nature Explore Outdoor Classrooms and will complete ADA, HVAC, and other necessary upgrades throughout the Campus. This Project does not represent an expansion of use. Therefore, the Project fulfills the requirements of CEQA Guidelines Section 15301.

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

<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 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.

As previously noted, this Project will convert approximately 8,046 square feet (sf) of existing paving and landscaping areas on the Campus into Nature Explore Outdoor Classrooms and will complete ADA, HVAC, and other necessary upgrades throughout the Campus. The Project will replace or reconstruct existing structures and facilities on the same Campus with updated components and systems that will essentially serve the same purpose. The Project will not result in an increase or alteration of the current use, function, or capacity of the existing Campus. 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 this Project indicates that it would not violate any of the exceptions, as described below.

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 setting.<sup>3</sup> The surrounding uses are residential, and public facilities. 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. The nearest significant ecological area (SEA) is the Griffith Park SEA, which is located approximately 3 miles north of the Campus.<sup>4</sup> The nearest critical habitat is designated as such for the coastal California gnatcatcher which is located approximately 12 miles southeast of the site.<sup>5</sup> The Project will be contained completely within the Campus boundaries. As such, the Project will not impact sensitive environments or locations. Additionally, the Project will not result in the development on or removal of any biologically sensitive uses.

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

The Project will not be expected to result in significant cumulative environmental impacts. As an active school campus, it is anticipated that projects such as routine maintenance activities or upgrades will occur on the Campus in the future. However, there are currently no known successive projects of the same type or scale planned for the Campus. As it stands, the Project is not expected to result in significant impacts. Therefore, no cumulative impacts will result from the Project and successive projects of the same type occurring at the same place over time.

<sup>3</sup> City of Los Angeles Planning Department, Zoning and Information Management System, <http://zimas.lacity.org/>. Accessed January 2022.

<sup>4</sup> Los Angeles County Department of Regional Planning, <http://rpgis.isd.lacounty.gov/>. Accessed January 2022.

<sup>5</sup> United States Fish and Wildlife Service Critical Habitat Portal, <https://ecos.fws.gov/ecp/report/table/critical-habitat.html>. Accessed January 2022.

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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 that will 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, then LAUSD's 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 District staff will be required before any trees can be removed. If vegetation removal is scheduled to occur between February 1 and August 31, a nesting bird survey would be performed prior to removal activities, per LAUSD's Standard Conditions of Approval (SC) SC-BIO-3.<sup>6</sup> Compliance with District specifications will ensure that there is not a reasonable possibility that the Project will have a significant effect on the environment due to unforeseen circumstances.

There will be approximately 300 cubic yards of soil exported, as a result of this Project. Consideration must be given to the management of excavated soils and/or to the earthwork activities involving more than 50 cubic yards of soil for the Project. If construction or earthmoving activities require import or export of soils and materials, OEHS must be notified to provide oversight to ensure that the import and/or export of soils are conducted in compliance with the requirements of District Specification Section 01 4524.<sup>7</sup> Since earthwork activities involve the disturbance of more than 50 cubic yards, OEHS will direct the completion of sampling and analysis of underlying soils which provides guidance to ensure compliance with South Coast Air Quality Management District (SCAQMD) Rule 1466. Any variances for compliance with Specification Section 01 4524 and SCAQMD Rule 1466 must be approved by OEHS.

Furthermore, as set forth in SC-CUL-7, SC-CUL-9, SC-CUL-10, and SC-CUL-11<sup>8</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 shall be recycled to the maximum extent feasible per SC-USS-1 of the Program EIR.<sup>9</sup> 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 designated scenic highway to the Campus is State Route 2 (SR2), which is located more than 10 miles north of the Project site.<sup>10</sup> This is a sufficient distance from this resource to be outside of the view shed, so the Project will not impact the characteristics that contribute to its scenic eligibility. Therefore, the Project will not result in damage to scenic resources or similar resources within a highway officially designated as a State scenic highway.

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

<sup>7</sup> LAUSD OEHS. "01 4524 Environmental Import/Export Material Testing". Available at: [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)

<sup>8</sup> LAUSD OEHS, "Standard Conditions of Approval for District Construction, Upgrade, and Improvement Projects". Adopted by the Board of Education on February 5, 2019.

<sup>9</sup> *Ibid.*

<sup>10</sup> Department of Transportation, <https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways>. Accessed January 2022.

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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 that is not included on any list compiled pursuant to Section 65962.5 of the Government Code.<sup>11</sup> 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 historic resource.*

Alexandria EEC is not eligible for federal, State, or local listing under any of the applicable criteria and is therefore not considered to be historical resources pursuant to CEQA. Therefore, the Project would not cause a substantial adverse change in the significance of a historic resource at this school site.<sup>12</sup>

Prepared By:

Alex Campbell,  
CEQA Project Manager/Contract Professional

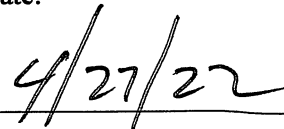
Phone and Email:

(323) 286-7377  
cp-alexis.campbell@lausd.net

Signed by:



Date:



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

<sup>11</sup> California, State of, Department of Toxic Substances Control, Envirostor Database, <http://www.envirostor.dtsc.ca.gov/public/search.asp>. Accessed January 2022.

<sup>12</sup> LAUSD OEHS. 2021. LAUSD Historic Resource Inventory Database.