

# Los Angeles Unified School District

## Office of Environmental Health and Safety

ALBERTO M. CARVALHO  
*Superintendent of Schools*

CARLOS A. TORRES  
*Director, Environmental Health and Safety*

JENNIFER FLORES  
*Deputy Director, Environmental Health and Safety*

### NOTICE OF EXEMPTION

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LOS ANGELES, COUNTY CLERK

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

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#### Project Title:

Nature Explorer Outdoor Classroom and Campus Upgrade at Five LAUSD Campuses

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#### Project Location – Specific:

- Holmes Early Education Center, 1810 E. 52nd Street, Los Angeles, CA 90058
- Telfair Early Education Center, 10915 Telfair Ave., Pacoima, CA 91331
- Vanalden Early Education Center, 6212 Vanalden Ave., Reseda, CA 91335
- Laurel Early Education Center, 8023 Willoughby Ave. Los Angeles, CA 9004
- Crescent Heights Early Education Center, 1700 S. Alvira St.. Los Angeles, CA 90035

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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 proposed Nature Explorer 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 five Los Angeles Unified School District (LAUSD) school campuses: Holmes Early Education Center (EEC), Telfair EEC, Vanalden EEC, Laurel EEC, and Crescent Heights EEC (Campuses).



The Project includes not only creating targeted outdoor learning environments, but holistically planning the outdoor classroom experience so it provides logical and accessible spaces throughout. The scope also includes roofing and HVAC replacement. The fire alarm system will be upgraded to meet current code requirements. Americans with Disabilities Act (ADA) accessibility upgrades will be incorporated into this Project.

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 those provided in LAUSD's Program Environmental Impact Report for the School Upgrade Program (Program EIR).<sup>1</sup> The primary purpose of the Project is to provide outdoor learning experiences. The Project would not cause an increase in student capacity or enrollment and would 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).

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**Name of Public Agency Approving the Project:**

Los Angeles Unified School District

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**Name of Person or Agency Carrying Out Project:**

Los Angeles Unified School District

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**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 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.

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<sup>1</sup> LAUSD OEHS, "School Upgrade Program Final Environmental Impact Report," <http://lachieve.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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The installation and/or replacement of structures and features of the Nature Explorer Classrooms within existing outdoor areas at the five EECs would constitute operation, repair, maintenance and minor alteration of existing public structures involving no expansion of the facilities' use.

All of 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 Explorer Classrooms within existing outdoor areas at the five EECs would constitute operation, repair, maintenance and minor alteration of existing campuses involving no expansion of the facilities' use. Therefore, the Project satisfies the requirements of CEQA Guidelines Section 15303.

#### 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.<sup>3</sup> None of the Project sites have been designated as biologically sensitive locations. The nearest significant ecological area (SEA) is Santa Monica Mountains which is located approximately 2.7 miles north of Crescent Heights EEC.<sup>4</sup> The nearest critical habitat is designated as such for the Coastal California gnatcatcher and is located approximately 6.8 miles east of the Crescent Heights EEC. As such, the Project will not impact sensitive environments or locations.<sup>5</sup> 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 would not result in any lasting 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.*

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

<sup>4</sup> United States Fish and Wildlife Service Critical Habitat Portal, <https://ecos.fws.gov/ecp/report/table/critical-habitat.html> accessed October 2022.

<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 October 2022.

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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 (SC) of approval SC-BIO-3 of the Program EIR.<sup>6</sup>

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> If 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 LAUSD's SC-CUL-7, SC-CUL-9, SC-CUL-10, and SC-CUL-11 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. 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;*

Telfair EEC is located approximately 2.08 miles west of Angeles Crest Highway, the nearest officially designated State scenic highway. The Project will not be visible from Angeles Crest Highway. Therefore, the Project will not result in damage to scenic resources or similar resources within a highway that is officially designated as a 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.<sup>7</sup> Therefore, the Project would 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 five Campuses are ineligible as historic resources.<sup>8</sup> Therefore, the Project would have no impact to a historic resource.

<sup>6</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>7</sup> [http://www.dtsc.ca.gov/SiteCleanup/Cortese\\_List.cfm](http://www.dtsc.ca.gov/SiteCleanup/Cortese_List.cfm), accessed October 2022.

<sup>8</sup> LAUSD. 2022. Historic Resources Inventory. Los Angeles, CA.

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Prepared By:

Alex Campbell  
CEQA Project Manager/Contract Professional

Phone and Email:

(213) 241-4210  
cp-alexis.campbell@LAUSD.net

Signed by:



Digitally signed by Carlos A. Torres  
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Date: 10/21/2022

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