

Los Angeles Unified School District

Office of Environmental Health and Safety


MEGAN K. REILLY
Interim Superintendent of Schools

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Director, Environmental Health and Safety

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NOTICE OF EXEMPTION

THIS NOTICE WAS POSTED
ON April 08 2022
UNTIL May 09 2022
REGISTRAR – RECORDER/COUNTY CLERK

2022 076567

FILED
Apr 08 2022
Dean C. Logen, Registrar – Recorder/County Clerk
Electronically signed by TERESA QUEVEDO

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:

Saturn Street Elementary School HVAC Project

Project Location – Specific:

The Saturn Street Elementary School HVAC Project (Project) will be located on the 4.1 acres Saturn Street Elementary School (Saturn ES) Campus. Saturn ES is located at 5360 Saturn Street in the City of Los Angeles. The Project will occur throughout the Campus.

Project Location – City:

Los Angeles

Project Location – County:

Los Angeles

Description of Nature, Purpose, and Beneficiaries of Project:

This Project provides a new heating, ventilation, and air conditioning (HVAC) system in the Main, Assembly, Classroom, and Kindergarten Buildings, and six portable buildings.

The Project will be implemented pursuant to all applicable State, federal, and local regulations and all applicable Los Angeles Unified School District (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 (SC) as adopted by the Board of Education in February 2019.¹ 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 Saturn ES students, faculty, staff, families, school supporters, and the community at large who may request access to the Campus pursuant to the Civic Center Act (CA Ed. Code Sections 38130 - 38139).

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

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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.



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*
- 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.

This Project provides a new heating, ventilation, and air conditioning (HVAC) system in the Main, Assembly, Classroom, and Kindergarten Buildings, and six portable buildings. Replacement of the HVAC systems 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.

As previously noted, this Project provides a new heating, ventilation, and air conditioning (HVAC) system in the Main, Assembly, Classroom, and Kindergarten Buildings, and six portable buildings. 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 the Project indicates that it will not violate any of the exceptions, as described in the following section.

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



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.³ The surrounding uses are residential and commercial. 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 Griffith Park which is located approximately 5.4 miles northeast of the Campus.⁴ The nearest critical habitat is designated as such for the Western snowy plover and is located approximately 6.2 miles southwest of the site.⁵ As such, the Project will not impact sensitive environments or locations.

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 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 will not result in potentially significant impacts. Therefore, no cumulative impacts will result from the Project and successive projects of the same type and at the same place over time.

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 Project does not constitute an expansion of use. The Project does not involve the removal of pavement and related earthwork, so soil testing was not conducted to assess the applicability of South Coast Air Quality Management District (SCAQMD) Rule 1466.⁶ If this were to occur, the Office of Environmental Health & Safety (OEHS) must be notified to provide oversight to ensure that these activities are conducted in compliance with the identified provisions of SCAQMD Rule 1466 and the requirements of District Specification 01 4524,⁷ and other applicable environmental agency rules and requirements. Furthermore, as set forth in SC-CUL-7, SC-CUL-9, SC-CUL-10, and SC-CUL-11 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 Project site is located approximately 13 miles east of State Route 27 (SR 27), the nearest officially designated State scenic highway.¹⁰ The Project will not be visible from SR 27. 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.

³ City of Los Angeles. ZIMAS. Available at: <http://zimas.lacity.org/>. Accessed September 2021.

⁴ Los Angeles County Department of Regional Planning, http://gis.planning.lacounty.gov/GIS-NET3_Public/Viewer.html, accessed September 2021.

⁵ United States Fish and Wildlife Service Critical Habitat Portal, <https://ecos.fws.gov/ccp/report/table/critical-habitat.html> accessed September 2021.

⁶ J.AUSD OEHS. 2020 "Saturn Street Elementary School - Soil Sampling Determination for Rule 1466 Compliance"

⁷ http://www.laschools.org/documents/file?file_id=219798234&show_all_versions_p=t

⁸ *Ibid.*

⁹ *Ibid.*

¹⁰ Los Angeles County Department of Regional Planning, http://gis.planning.lacounty.gov/GIS-NET3_Public/Viewer.html. Accessed September 2021.



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 which is not included on any list compiled pursuant to Section 65962.5 of the Government Code.¹¹ Therefore, the Project will not have an impact 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.*

Saturn ES is a school site over 45 years old, meeting LAUSD's threshold for review as potential historic resources and requiring an evaluation for historic eligibility. LAUSD has identified Saturn ES as eligible for listing as a historic resource per Section 18955 of the California State Historical Building Code (CHBC).¹²

In accordance with CEQA Guidelines Section 15064.5(b)(3), a project that conforms to the *Secretary of the Interior's Standards for the Treatment of Historic Properties (Secretary's Standards)* is generally considered to be a project that will not cause a significant adverse impact. (14 CCR Section 15126.4(b)(1)). If a project meets the *Secretary's Standards*, the project can, in most cases, be considered categorically exempt from CEQA (14 CCR Section 15331) and qualify for a Notice of Exemption.

Secretary's Standards conformance reviews were completed by OEHS's Historic Preservation Specialist for Saturn ES to ensure compliance with applicable guidelines (the *Secretary's Standards* and *Los Angeles Unified School District Design Guidelines and Treatment Approaches for Historic Schools (LAUSD Design Guidelines)*). The *Secretary's Standards* conformance reviews found that the Project conforms to the *Secretary's Standards* at Saturn ES.¹³ The work associated with the HVAC Replacement Project shall conform with the *Secretary's Standards* and the *LAUSD Design Guidelines*, OEHS' Historic Preservation Specialist has determined that the Project meets the requirements specified in CEQA Guidelines Section 15064.5(b)(3) and will not cause a substantial adverse change in the significance of a historical resource.

Should the scope of the Project activities be altered from the components that are described above, standard District procedure requires 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.

¹¹ California Department of Toxic Substances Control. DTSC Databases. Available at: <http://www.dtsc.ca.gov/database/>. Accessed September 2021.

¹² State of California. 2003. State Historical Building Code, Health and Safety Code, Division 13, Part 2.7, Section 18955. Available at: http://www.dgs.ca.gov/dsa/AboutUs/shbsb/shbsb_health_safety.aspx. Also see California Building Standards Commission. 2014. California Code of Regulations, Title 24, California Historical Building Code, Section 8-101.2. Washington, DC. p. 4.

¹³ LAUSD OEHS. 2021. "Saturn ES SOIS Compliance Review"



Prepared By:

Alex Campbell
CEQA Project Manager

Signed by:

A handwritten signature in black ink, appearing to read 'C. Torres', written over a horizontal line.

Digitally signed by
Carlos A. Torres
Date: 2021.10.14
09:53:20 -07'00'

Carlos A. Torres
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Date: