

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

PLACE
"FILED"
STICKER
HERE

2023 085252

FILED
Apr 18 2023

Dean C. Logan, Registrar - Recorder/County Clerk

Electronically signed by TODD TRAN

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:

Lockwood Elementary School - Seismic Retrofits and HVAC at Main Building

Project Location – Specific:

The Lockwood Elementary School Seismic Retrofits and HVAC at Main Building Project (Project) will be located on the 3.3-acre Lockwood Elementary School (Lockwood ES) Campus. The Lockwood ES Campus (Campus) is located at 4345 Lockwood Avenue in the City of Los Angeles. It is bound by Willow Brook Avenue to the north, Virgil Avenue to the east, Lockwood Avenue to the south, and North Madison Avenue to the west. The Campus is located in an urbanized community primarily consisting of commercial uses, multi-family, and single-family residences.

Project Location – City:

Los Angeles

Project Location – County:

Los Angeles

Description of Nature, Purpose, and Beneficiaries of Project:

The Project will provide seismic retrofits to the Main Building with a total area of approximately 11,480 square feet. The Project will strengthen existing wall piers with concrete reinforcement; existing walls with fiber-reinforced polymer (FRP); existing diaphragm chords and connections with FRP and metal anchorage; and existing foundation connections with FRP anchors. The scope of work also includes new heating, ventilation, and air conditioning (HVAC) systems and American with Disabilities Act (ADA) upgrades as required by code.

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 as adopted by the Board of Education in February 2019 (SC).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 LAUSD's projects.

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

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.*

PLACE
"FILED"
STICKER
HERE

The beneficiaries of the Project include students and staff at Lockwood ES and the community at large who may request access to the campus 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 15331– Historical Resource Restoration/Rehabilitation*
- 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 provide seismic retrofits to the Main Building with a total area of approximately 11,480 square feet. The Project will strengthen existing wall piers with concrete reinforcement; existing walls with fiber-reinforced polymer (FRP); existing diaphragm chords and connections with FRP and metal anchorage; and existing foundation connections with FRP anchors. This Project will also provide new HVAC systems and ADA upgrades as required to an existing building on Campus. The Project 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, the Project will provide seismic retrofits to the Main Building with a total area of approximately 11,480 square feet. The Project will strengthen existing wall piers with concrete reinforcement; existing walls with fiber-reinforced polymer (FRP); existing diaphragm chords and connections with FRP and metal anchorage; and existing foundation connections with FRP anchors. This Project will also provide new HVAC systems and ADA upgrades as required. 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.

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

PLACE
“FILED”
STICKER
HERE

Section 15331 – Historical Resource Restoration/Rehabilitation

Class 31 consists of projects limited to maintenance, repair, stabilization, rehabilitation, restoration, preservation, conservation, or reconstruction of historical resources in a manner consistent with the Secretary of the Interior’s Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings.

The Campus was evaluated by OEHS’s Historic Preservation Specialist and the Main Building has been determined to be a historical resource as defined by CEQA.³ The Project consists of structural upgrades to the Main Building to conform to seismic code requirements, new HVAC systems, and ADA accessibility upgrades. The Project will be completed in compliance with the *Secretary of the Interior’s Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings* or the *Secretary of the Interior’s Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (Secretary’s Standards)*⁴. Therefore, the Project satisfies the requirements of CEQA Guidelines Section 15331.

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.

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

The Project site is a fully developed campus within urbanized communities.⁵ The Project site is not designated as a biologically sensitive site or location and does not contain sensitive resources or habitat that will be impacted by the Project. The Project will be contained exclusively within the boundaries of the Campus. The nearest sensitive environment to the Project site is Griffith Park, which is located approximately 2 miles north of Lockwood ES.^{6,7} 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 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

³ Los Angeles Unified School District. Updated in 2023. LAUSD Historic Resources Inventory Database. Los Angeles, CA.

⁴ National Park Service, Department of the Interior, Washington DC. 1995. *Secretary of the Interior’s (SOI) Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring and Reconstructing Historic Buildings*. Available at: <http://www.nps.gov/tps/standards/rehabilitation/rehabilitation-guidelines.pdf>

⁵ City of Los Angeles Planning Department, *Zoning and Information Management System*, <http://zimas.lacity.org/>, accessed March 2023.

⁶ United States Fish and Wildlife Service Critical Habitat Portal, <https://ecos.fws.gov/ecp/report/table/critical-habitat.html> accessed March 2023.

⁷ Los Angeles County Department of Regional Planning, http://gis.planning.lacounty.gov/GIS-NET3_Public/Viewer.html, accessed March 2023.

PLACE
"FILED"
STICKER
HERE

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. All tree trimming and removal conducted on District property is required to adhere to the procedures described in the LAUSD OEHS Tree Trimming and Removal Procedure.⁸ 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.⁹

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. 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, relevant provisions of South Coast Air Quality Management District Rule 1466, and other applicable environmental agency rules and requirements.¹⁰ Furthermore, as set forth in SC-CUL-6, SC-CUL-7, SC-CUL-10, and SC-CUL-11 of the Program EIR, 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.¹¹ Lastly, any construction and demolition waste shall be recycled to the maximum extent feasible per SC-USS-1 of the Program EIR.¹² 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 state scenic highway to the Project site is State Route 2 (SR 2), which is approximately 11 miles northeast of Lockwood ES.¹³ The Project will not be visible from SR 2. 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*

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.¹⁴ 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.*

Lockwood ES is over 45 years old, meeting LAUSD's threshold for review as a potential historic resource and requiring an evaluation for historic eligibility. LAUSD has identified Lockwood ES as eligible for listing as a

⁸ LAUSD OEHS, "Tree Trimming and Removal Procedure," <https://achieve.lausd.net/ceqa>

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

¹⁰ LAUSD OEHS, "Section 01 4524 Environmental Import/Export Materials Testing",

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

¹¹ LAUSD OEHS, "School Upgrade Program Final Environmental Impact Report," <http://achieve.lausd.net/ceqa>, Adopted by the Board of Education on November 10, 2015.

¹² *Ibid.*

¹³ Los Angeles County Department of Regional Planning, http://gis.planning.lacounty.gov/GIS-NE13_Public/Viewer.html. Accessed March 2023.

¹⁴ California Department of Toxic Substances Control, DTSC Databases. Available at: <http://www.dtsc.ca.gov/database/>. Accessed March 2023.

PLACE
"FILED"
STICKER
HERE

historic resource per Section 5020.1(J) of the California Public Resources Code (PRC).¹⁵ Lockwood ES appears individually eligible for the National Register of Historic Places, the California Register of Historical Resources, and as a Los Angeles Historic Cultural Monument through survey evaluation. Built in 1924 in a Romanesque style, the Main Building was renovated in 1935/1936 in the Streamline Moderne style with extensive use of concrete.¹⁶

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 Lockwood 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 Lockwood ES.¹⁷ As the work at the school shall conform with the *Secretary's Standards* and the *LAUSD Design Guidelines*, OEHS' Historical 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 LAUSD 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.

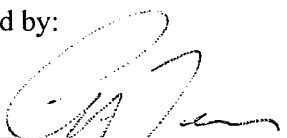
Prepared By:

Christy Wong
CEQA Project Manager

Phone and Email:

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

Signed by:



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

Date:

3/24/2023

¹⁵ Public Resources Code Section 5020.1 (J)
¹⁶ Los Angeles Unified School District. 2021. Lockwood Elementary School DPR 523A.
¹⁷ LAUSD OEHS. 2023. "Lockwood ES SOIS Compliance Review"