

# 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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**ORIGINAL FILED**

**DEC 01 2023**

**LOS ANGELES COUNTY CLERK**

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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  
21st Floor  
Los Angeles, CA 90017

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**Project Title:**

Soto Street Elementary School – ADA Improvements

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**Project Location – Specific:**

The Soto Street Elementary School ADA Improvements Project (Project) will be located on the 2.4-acre Soto Street Elementary School (Soto ES) campus. The Soto ES Campus (Campus) is located at 1020 South Soto Street in the City of Los Angeles. It is bound by Seventh Street to the north, South Fickett Street to the east, Interstate 5 to the south, and South Soto Street to the west. The Campus is located in an urbanized community primarily consisting of commercial uses, multi-family, and single-family residences.

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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 Project includes the installation of an Americans with Disabilities Act (ADA) compliant ramp with retaining wall, an accessible gate to the parking lot, one intercom, and one parking lot upgrade (Figure 1). The LAUSD Board of Education approved the Project's budget of \$1,705,183 on June 13, 2023.

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 comply with current ADA access requirements. 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 Soto ES 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).

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

Los Angeles Unified School District

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<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.

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**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 15303 – New Construction or Conversion of Small Structures*
  - *CEQA Guidelines Section 15311 – Accessory 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.

The Project entails the installation of an ADA compliant ramp with retaining wall, an accessible gate to the parking lot, one intercom, and one parking lot upgrade. The Project would involve minor alterations to an existing public structure and would occur within the area occupied by existing facilities at the Project site. The ADA Improvements would not present a new or expanded use of the Project site. Therefore, the Project constitutes minor alterations to an existing school site 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 Project includes the construction and location of a small new structure, such as the installation of an ADA compliant ramp. The Project also includes the installation of small new equipment, such as the installation of an intercom. Therefore, the Project satisfies the requirements of CEQA Guidelines Section 15303.

Section 15311 Accessory Structures

Class 11 consists of construction or replacement of minor structures accessory to (appurtenant to) existing commercial, industrial, or institutional facilities, including, but not limited to, on premise signs and small parking lots.

The Project includes the construction or replacement of minor structures accessory to existing institutional facilities, specifically the installation of an Americans with Disabilities Act (ADA) compliant ramp with retaining wall, an accessible gate to the parking lot, one intercom, and one parking lot upgrade. Therefore, the Project satisfies the requirements of CEQA Guidelines Section 15311.

Section 15300.2 – Exceptions

<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 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 site is a fully developed Campus within an urbanized community.<sup>3</sup> The Project site is not designated as a biologically sensitive location. The nearest significant ecological area to the Project site is Puente Hills located 6.7 miles east of Soto ES and the nearest critical habitat is the Coastal California gnatcatcher, located approximately 6.7 miles east of the Campus.<sup>4,5</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 Campus is an active school site and there will likely be ongoing maintenance activities and minor projects on the Campus to keep the school 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.*

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. 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.<sup>6</sup> 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>7</sup>

The Project may include minor ground-disturbing activities. These activities are not considered unusual circumstances 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. As the Project involves the removal of pavement, soil sampling and testing for characterization is required prior to demolition and removal of the paving materials. 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.<sup>8</sup> 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.<sup>9</sup> Lastly, any construction and demolition waste shall

<sup>3</sup> City of Los Angeles Planning Department, *Zoning and Information Management System*, <http://zimas.lacity.org/>, accessed November 2023.

<sup>4</sup> United States Fish and Wildlife Service Critical Habitat Portal, <https://ecos.fws.gov/ecp/report/table/critical-habitat.html> accessed November 2023.

<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 November 2023.

<sup>6</sup> LAUSD OEHS, "Tree Trimming and Removal Procedure," <https://achieve.lausd.net/ceqa>

<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 Materials 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)

<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.

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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 state scenic highway;*

The closest designated state scenic highway to Soto ES is State Route 2 (SR2), which is located approximately 13.5 miles north of the Campus.<sup>11</sup> In addition, the Project would not result in the removal of historic buildings, rock outcroppings, or other scenic resources. 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 Project site is not listed on any list compiled pursuant to Section 65962.5 of the Government Code.<sup>12</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.*

Soto ES is a school site 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 Soto ES as eligible for listing as a historic resource per Section 18955 of the California State Historical Building Code (CHBC).<sup>13</sup> The Main Building on the Campus has been identified as eligible for listing on the National Register of Historic Places and is listed on the California Register of Historical Resources. The building conveys school planning principles following increased seismic requirements instituted under the Field Act established by the State of California in 1933. The building was designed in 1935 by notable architect William Lee Woollett in the PWA Moderne architectural style popular throughout the District at the time.<sup>14</sup>

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 review was completed by OEHS’s Historic Preservation Specialist for Soto 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 review found that the Project conforms to the *Secretary’s Standards* at Soto ES<sup>15</sup>. Although the Project will alter the existing stairs at the East Building’s main entrance, it will retain all of the essential characteristics that convey its historical and architectural significance. As the work at the school shall conform with the *Secretary’s Standards* and the *LAUSD Design Guidelines*, OEHS’ Historic Preservation Specialist has determined that the Project meets the

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

<sup>11</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 November 2023.

<sup>12</sup> [http://www.dtsc.ca.gov/SiteCleanup/Cortese\\_List.cfm](http://www.dtsc.ca.gov/SiteCleanup/Cortese_List.cfm), accessed November 2023.

<sup>13</sup> 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](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.

<sup>14</sup> LAUSD OEHS. 2023. “Soto ES SOIS Compliance Review”

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

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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.

Prepared By:

Christy Wong  
CEQA Project Manager

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Signed by:



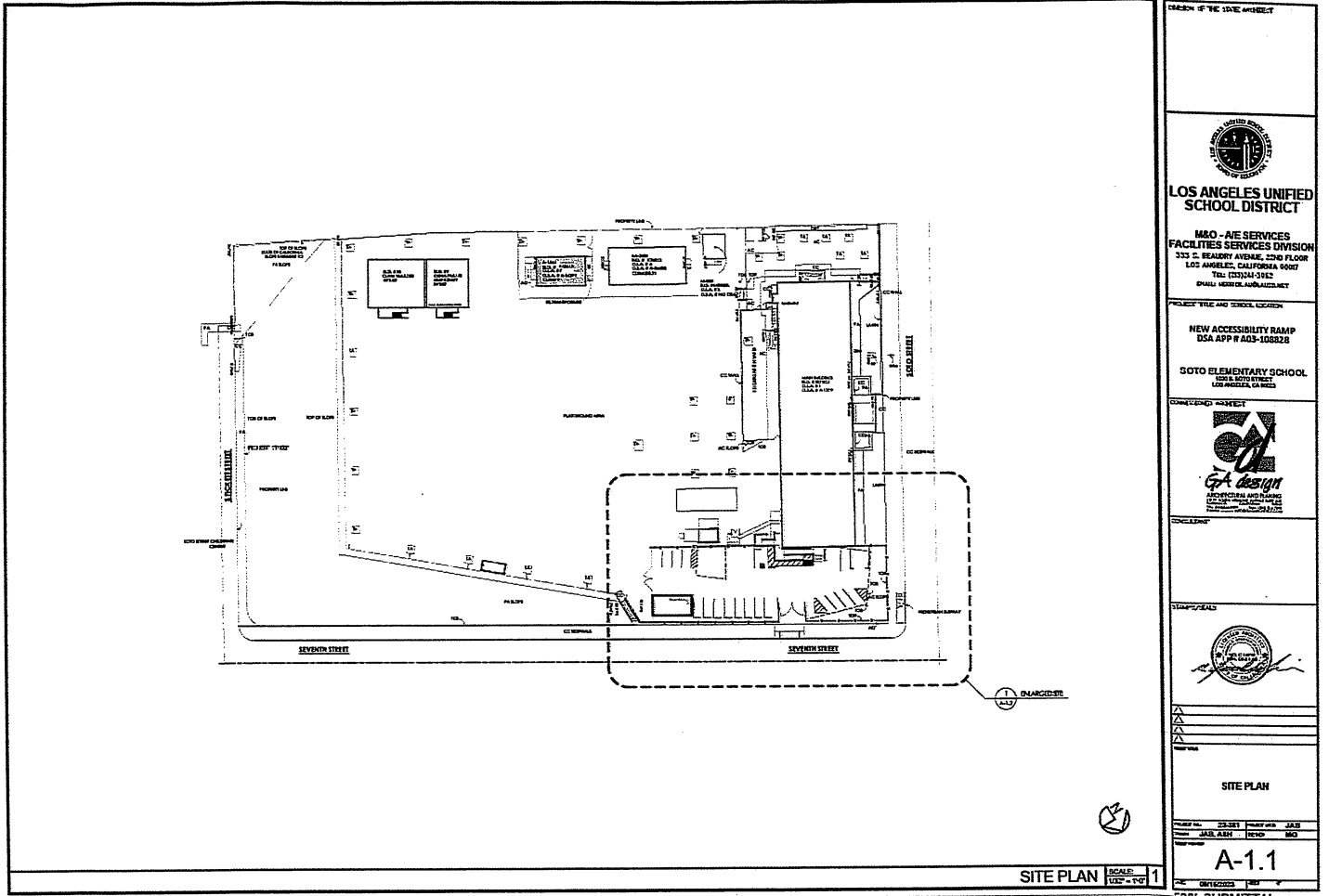
\_\_\_\_\_  
Carlos A. Torres,  
CEQA Officer of the Los Angeles Unified School District

Date:

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11/13/23

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Figure 1 – Site Plan



SECTION OF THE STATE ARCHITECT

**LOS ANGELES UNIFIED SCHOOL DISTRICT**

M&O - A/E SERVICES  
FACILITIES SERVICES DIVISION  
333 S. BRADY AVENUE, 22ND FLOOR  
LOS ANGELES, CALIFORNIA 90007  
TEL: (323)241-3922  
DALLI@EDU.LASD.USCA.EDU

PROJECT TITLE AND SCHOOL LOCATION

NEW ACCESSIBILITY RAMP  
ECLA APP # A03-1003218

GOTO ELEMENTARY SCHOOL  
1028 S. GOTO STREET  
LOS ANGELES, CA 90005

CONSULTING ARCHITECT

**GA DESIGN**  
ARCHITECTURAL AND PLANNING  
1028 S. GOTO STREET  
LOS ANGELES, CA 90005  
(323) 241-3922

CONTRACT NO.

DATE

**SITE PLAN**

DATE: 03-28-21 DRAWN BY: JAS  
CHECKED BY: JAS, ASH REVISED BY: BMO

**A-1.1**

SCALE: 1/8" = 1'-0"