

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

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Deputy Director, Environmental Health and Safety

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
21st Floor
Los Angeles, CA 90017

Project Title:

Gardena High School Football Stadium and Synthetic Track Upgrade

Project Location – Specific:

Gardena High School – 1301 West 182nd Street, Gardena, California 90247

Project Location – City:

Los Angeles

Project Location – County:

Los Angeles

Description of Nature, Purpose, and Beneficiaries of Project:

The proposed project (Project) will upgrade the existing athletic field area of Gardena High School (Campus). The Project will demolish and remove the existing stadium bleachers, scoreboard, decomposed granite track, and natural grass field. To replace these features, the Project will construct a synthetic (all-weather) competitive eight-lane track, field event facilities (long jump, triple jump, high jump), regulation size natural grass football/soccer field, shot put area improvements, home bleachers and visitor bleachers, press box and sound system, scoreboard, football goal posts, fencing gates, and associated site improvements such as installation of landscape and hardscape, irrigation and drainage, and exterior repaint of existing buildings. The activity will affect approximately 6.5 acres of the existing athletic field area. The Board of Education approved the Project's budget of \$22,412,311 on June 20, 2023.

Minor work will include improvements to ensure compliance with local, state, and federal requirements including those of the American with Disabilities Act (ADA), Division of State Architect (DSA), California Environmental Quality (CEQA), and Department of Toxic Substances Control (DTSC).

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

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.

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Approval for District Construction, Upgrade, and Improvements Projects (SC) as adopted by the Board of Education on February 2019. 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 Gardena High School 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). The proposed athletic facilities upgrade will support the school's physical education program, competitive athletic programs and allow the school to host athletic events and other school community events. The upgraded athletic facilities, once completed, will provide modern high-performance athletic facilities that support physical educational programs, student athletic achievement, and competitive athletic programs. In 2022-23, the athletic program of Gardena Senior High included 342 athletes.

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 15268¹]:
- ☐ 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 15303 – New Construction Minor Alterations*
 - *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 proposed Project will upgrade existing athletic field facilities to accommodate construction of a synthetic (all-weather) competitive 8-lane track, field event facilities (long jump, triple jump, high jump), regulation size natural grass football/soccer field, shot put area improvements, home bleachers and visitor bleachers, press box and sound system, scoreboard, football goal posts, fencing gates, and associated site improvement. The Project will not generate growth or require the addition or construction of new or expanded facilities. Therefore, the Project fulfills the requirements of CEQA Guidelines Section 15301.

¹ 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.

The proposed Project will include removal and demolition of existing stadium bleachers, scoreboard, decomposed granite track, and natural grass field relocation and removal of existing minor accessory structures. The proposed Project will include construction of bleachers, press box and sound system, scoreboard, football goal posts, and fencing gates. The proposed 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 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 proposed Project will include construction of bleachers, press box and sound system, scoreboard, football goal posts, and fencing gates that qualifies as small facilities or structures. 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 proposed Project will include the removal and relocation of small accessory structures including bleachers, press box and sound system, scoreboard, football goal posts, and fencing gates. The proposed Project will include construction of bleachers, press box and sound system, scoreboard, football goal posts, and fencing gates. These structures are minor accessories to the existing Campus. Therefore, the Project satisfies the requirements of CEQA Guidelines Section 15311.

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 a heavily urbanized area of Los Angeles surrounded by residential, industrial, agricultural uses and structures and is not an environmental resource of hazardous or critical concern where designated, precisely mapped, and officially

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adopted pursuant to law by federal, state, or local agencies.² The nearest significant ecological area (SEA) is the Madrona Marsh Preserve SEA in Torrance located approximately 3.5 miles southwest of the Project site.³ The nearest sensitive environment to the Project site is the Coastal California gnatcatcher habitat in Torrance located approximately 5.5 miles south of the Project site.^{4,5} As such, the Project will not impact sensitive environments or locations.

2. *Cumulative impacts will be considerable because successive projects of the same type 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. There are currently no known successive projects of the same type or scale planned for the Campus. 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. 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 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.⁶ 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.⁷

The Project will 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. 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

² City of Los Angeles Planning Department, *Zoning and Information Management System*, <http://zimas.lacity.org/>, accessed September 2023.

³ Los Angeles County Department of Regional Planning, http://gis.planning.lacounty.gov/GIS-NET3_Public/Viewer.html, accessed September 2023.

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

⁵ Los Angeles County Department of Regional Planning, http://gis.planning.lacounty.gov/GIS-NET3_Public/Viewer.html, accessed September 2023.

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

⁷ LAUSD OEHS, "School Upgrade Program Final Environmental Impact Report," <https://www.lausd.org/CEQA>, Adopted by the Board of Education on November 10, 2015.

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provisions of South Coast Air Quality Management District Rule 1466, and other applicable environmental agency rules and requirements.⁸ 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.⁹ Lastly, any construction and demolition waste shall be recycled to the maximum extent feasible per SC-USS-1 of the Program EIR.¹⁰ 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;*

The closest designated state scenic highway to the Project site is the Topanga Canyon State Scenic Highway, a 2.5-mile portion of State Route 27 (SR-27), which is located approximately 20.4 miles northwest of the Campus.¹¹ The Project will not result in the removal of historic buildings, rock outcroppings, or other scenic resources. Therefore, the Project will 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 located on any sites that are included on any list compiled pursuant to Government Code Section 65962.5.¹² 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.*

Gardena High School is over 45 years old, meeting the state of California's threshold for review as potential historic resources and requiring evaluations for historic eligibility. Gardena High School was found eligible for NRHP listing as historic district per Section 18955 of the California State Historical Building Code (CHBC).¹³

The Gardena High School campus was identified as significant for its historical (Criteria A/1) association with campus development as an excellent example of a finger-plan school and as an excellent example of the Mid-Century Modern architectural style (Criteria C/3).

⁸ LAUSD OEHS, "Section 01 4524 Environmental Import/Export Materials Testing", http://www.laschools.org/documents/file?file_id=219798234&show_all_versions_p=t

⁹ LAUSD OEHS, "School Upgrade Program Final Environmental Impact Report," <https://www.lausd.org/CEQA>, Adopted by the Board of Education on November 10, 2015.

¹⁰ *Ibid.*

¹¹ Los Angeles County Department of Regional Planning, http://gis.planning.lacounty.gov/GIS-NET3_Public/Viewer.html, accessed September 2023.

¹² California Department of Toxic Substances, http://www.dtsc.ca.gov/SiteCleanup/Cortese_List.cfm, accessed September 2023.

¹³ 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.

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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.

The Project at Gardena High School was reviewed by LAUSD's Historic Preservation Specialist 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)*). This review found that the Project components are limited to modifications to the athletic field area, which is not a contributing element of the historic district. 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 District procedure requires that OEHS must be notified immediately to ensure that these activities are conducted in compliance with the *Secretary's Standards* and will not cause a substantial adverse change in the significance of a historical resource.

Prepared By:

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Signed by:



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

Date:



Attachment: Exhibit A – Site Plan

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EXHIBIT A – CAMPUS SITE PLAN (not to scale)



