

Los Angeles Unified School District

Office of Environmental Health and Safety


ALBERTO M. CARVALHO
Superintendent of Schools

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Director, Environmental Health and Safety

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Deputy Director, Environmental Health and Safety

NOTICE OF EXEMPTION

THIS NOTICE WAS POSTED	
ON	<u>December 08 2023</u>
UNTIL	<u>January 08 2024</u>
REGISTRAR -- RECORDER/COUNTY CLERK	

2023 263749

FILED
Dec 08 2023
Dean C. Logan, Registrar - Recorder/County Clerk
Electronically signed by VALERIE VALADEZ

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:

Cowan Avenue Elementary School – Slope Repair Project

Project Location – Specific:

The Cowan Avenue Elementary School Slope Repair (Project) will be located on the 8.5-acre Cowan Avenue Elementary School (Cowan ES) Campus. The Cowan ES Campus (Campus) is located at 7615 Cowan Avenue in the city of Los Angeles. The Project will occur on the existing Cowan ES playground and perimeter area, as shown in Figure 1, Site Plan.

Project Location – City:

Los Angeles

Project Location – County:

Los Angeles

Description of Nature, Purpose, and Beneficiaries of Project:

This Project will repair the on-site portion of an eroded slope along the northwest corner of the main playground at Cowan ES. The Project will provide new drainage, foundation, and perimeter fencing, rails and poles to prevent further slope erosion. In addition, the Project will replace approximately 18,900 square feet of asphalt pavement on the playground; regrade for proper drainage; and repair cracks, spalling, and local settlement of the pavement.. The Project has an estimated budget of \$2,957,057.

The Project will be constructed per DSA-approved plan sets. 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).¹ The primary purpose of the Project is to repair severely eroded areas of the main playground. The Project will not cause an increase in student capacity or enrollment and will not result in an increase in the

¹ 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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intensity of use of the campus. The beneficiaries of the Project include students and staff at Cowan ES 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).

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.

The Project will result in the repair of the on-site portion of the eroded slope along the northwest corner of the main playground. Approximately 18,900 square feet of asphalt pavement at the playground will be replaced, and the repair of all cracks, spalling and local settlement at the pavement would occur. The asphalt and pavement will be regraded to allow for proper drainage. In addition, the Project would construct raised concrete curbs at the tree areas to prevent erosion at the tree wells. Therefore, the Project constitutes minor alterations to an existing school site that results in no expansion of use and meets 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 will result in the repair of the on-site portion of the eroded slope along the northwest corner of the main playground. Improvements to the site's drainage to reduce the potential for erosion would occur. The Project will not result in an increase or alteration of the current use, function, or capacity of the existing Campus. Therefore, the Project meets 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



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 would not violate any of the exceptions, as described below.

1. *The projects would occur in certain specified sensitive environments or locations;*

The Project site is a fully developed campus within an urbanized community.³ The Project site has not been designated as a biologically sensitive location. The nearest threatened or endangered species is the Braunton's milk-vetch located approximately 10 miles north of the Project site. The nearest sensitive environment to the Project site is the Ballona Wetlands, located approximately 1.3 miles west of the campus.^{4,5} 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 to keep the campus operational. As the Project will not result in any lasting impacts once construction is complete, implementation of the proposed Project will not contribute to any 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 upgrades associated with the Project is comparable to other modernizations and improvements that are being completed throughout the District under the School Upgrade Program. 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 Standard Conditions of Approval for District Construction, Upgrade, and Improvements Projects as adopted by the Board of Education in February 2019.⁶

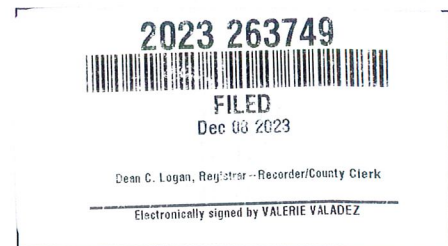
The Project will include minor ground-disturbing activities. These activities are not considered unusual circumstances for the classes of projects under which an exemption is claimed. All Project

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

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

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

⁶ LAUSD OEHS, "Standard Conditions of Approval for District Construction, Upgrade, and Improvements Projects," Adopted by the Board of Education on February 5, 2019.



related ground disturbing activities would comply with SC-AQ-1, SC-AQ-2, SC-AQ-3, and SC-AQ-4. As the Projects involve the removal of pavement, soil sampling and testing has or will be conducted and a determination memorandum will be created prior to demolition and removal of the paving materials. Excavated soils will only be reused onsite if they are placed beneath paved areas. As it is anticipated that construction or earthmoving activities will require the import and 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.⁷ 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.⁸ Lastly, any construction and demolition waste shall be recycled to the maximum extent feasible per SC-USS-1 of the Program EIR.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 state scenic highway;*

The closest designated state scenic highway is the State Route 27 (SR27), which is located approximately 11 miles north of the campus.¹⁰ Therefore, the proposed 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 Campus is not located on a site that is included on any list compiled pursuant to Section 65962.5 of the Government Code.¹¹ 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.*

Cowan ES has been surveyed for consideration as a historical resource, and has been determined to be ineligible for listing and is therefore not considered a historical resource pursuant to CEQA.¹² Therefore, OEHS' Historical Preservation Specialist has determined that the Project does not have the potential to adversely impact historical resources.

⁷ LAUSD OEHS, "Section 01 4524 Environmental Import/Export Materials Testing", http://www.laschools.org/documents/file?file_id=219798234&show_all_versions_p=t

⁸ LAUSD OEHS, "School Upgrade Program Final Environmental Impact Report," <http://achieve.lausd.net/ceqa>, Adopted by the Board of Education on November 10, 2015.

⁹ *Ibid.*

¹⁰ http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/, accessed November 2023.

¹¹ http://www.dtsc.ca.gov/SiteCleanup/Cortese_List.cfm, accessed November 2023.

¹² LAUSD OEHS. 2023. LAUSD Historic Resources Database.

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Dean C. Logan, Registrar - Recorder/County Clerk

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Prepared By:

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Signed by:

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

Date:

11/30/23

Figure 1 Project Site Plan



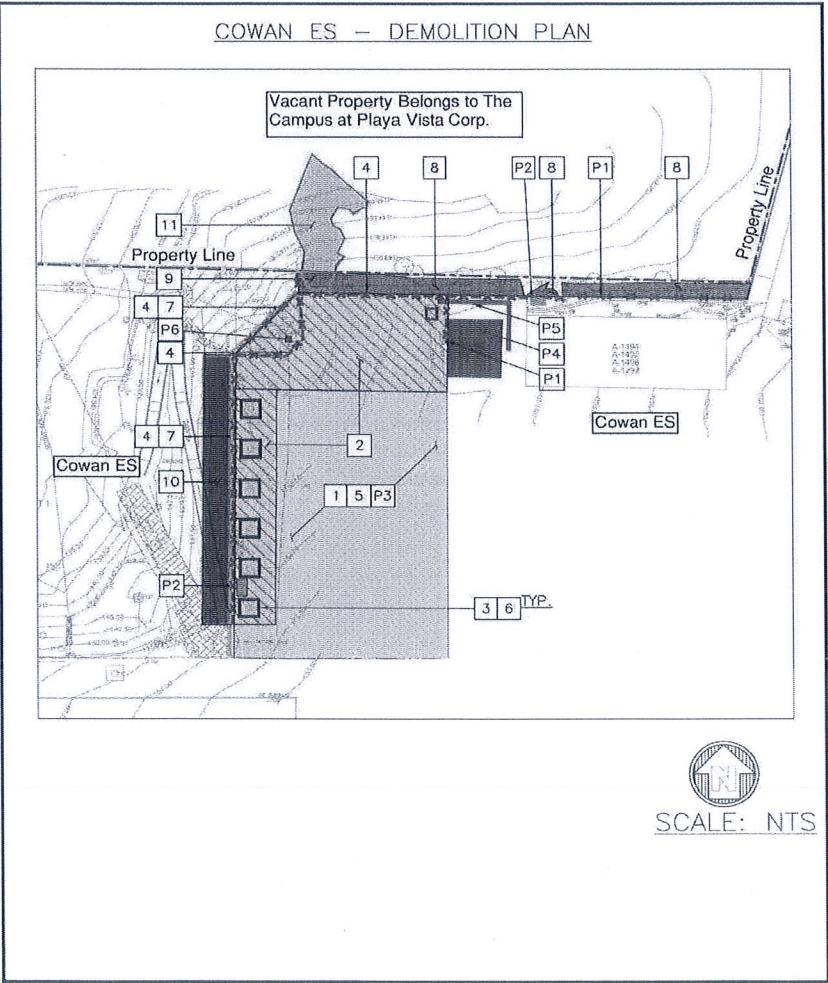
Los Angeles Unified School District

Facilities Services Division – Existing Facilities

Maintenance & Operations

F. DRAWINGS

CIVIL DEMOLITION PLAN AND LEGEND



LAUSD OEHS
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