

# 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



THIS NOTICE WAS POSTED  
ON August 29 2024  
UNTIL September 30 2024  
REGISTRAR - RECORDER/COUNTY CLERK

**To:** County Clerk and Registrar-Recorder  
County of Los Angeles  
12400 Imperial Highway  
Norwalk, CA 90650

**From:** LAUSD OEHS  
333 S. Beaudry Avenue  
21<sup>st</sup> Floor  
Los Angeles, CA 90017

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#### Project Title:

Bell High School Field Upgrades with Natural Turf & Track

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#### Project Location – Specific:

Bell High School – 4328 Bell Avenue, Bell, California 90201

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#### Project Location – City:

Bell

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#### Project Location – County:

Los Angeles

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#### Description of Nature, Purpose, and Beneficiaries of Project:

The proposed project (Project) will upgrade the existing athletic field area of Bell High School (Bell HS or Campus). The Project will demolish and remove the existing natural grass football/soccer field and decomposed granite track, field event facilities, and scoreboard. To replace these features, the Project will construct a new regulation-sized natural grass football/soccer field; decomposed granite track (six lanes); field event facilities (long jump, triple jump, high jump, and shot-put); irrigation and drainage; security fencing, walls, and gates; electronic scoreboard; and associated landscape, hardscape, and infrastructure upgrades. The activity will affect approximately 4.2 acres of the existing athletic field area (Exhibit A). The Board of Education approved the Project's budget of \$11,112,253 on August 22, 2023.

Minor work will include improvements within the Project area 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 Approval for District Construction, Upgrade, and Improvements Projects (SC) as adopted by the Board of

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333 South Beaudry Avenue, 21<sup>st</sup> 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.*



# Los Angeles Unified School District

## Office of Environmental Health and Safety

Education on December 12, 2023.<sup>1</sup> 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 Bell HS 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 Bell HS included 531 athletes and 14 sports.

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

Los Angeles Unified School District

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**Name of Person or Agency Carrying Out Project:**

Los Angeles Unified School District

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**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 15302 – Replacement or Reconstruction*
  - *CEQA Guidelines Section 15303 – New Construction Minor Alterations*
  - *CEQA Guidelines Section 15311 – Accessory Structures*
  - *CEQA Guidelines Section 15314 – Minor Additions to Schools*
- 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 demolish and remove the existing natural grass football/soccer field and decomposed granite track, field event facilities (long jump, triple jump, high jump, and shot-put);, and scoreboard. These features will be replaced in-kind with the construction of a new regulation sized natural grass football/soccer field; decomposed granite track (six lanes); field event facilities (long jump, triple jump, high jump, and shot-put); irrigation and drainage; security fencing, walls, gates; electronic scoreboard and associated landscape,

<sup>1</sup> LAUSD OEHS, "Standard Conditions of Approval for District Construction, Upgrade, and Improvement Projects (SCs)" [https://www.lausd.org/cms/lib/CA01000043/Centricity/domain/135/ceqa/2023\\_Standard\\_Conditions\\_UPDATE\\_Final.pdf](https://www.lausd.org/cms/lib/CA01000043/Centricity/domain/135/ceqa/2023_Standard_Conditions_UPDATE_Final.pdf)

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



# Los Angeles Unified School District

## Office of Environmental Health and Safety

hardscape, and infrastructure upgrade. 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.

### 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 Project will demolish and remove the existing natural grass football/soccer field and decomposed granite track, field event facilities, and scoreboard. These features will be replaced in-kind with the construction of a new regulation sized natural grass football/soccer field; decomposed granite track (six lanes); field event facilities (long jump, triple jump, high jump, and shot-put); irrigation and drainage; security fencing, walls, gates; electronic scoreboard and associated landscape, hardscape, and infrastructure upgrade. 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 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 will consist of the construction of a new regulation sized natural grass football/soccer field; decomposed granite track (six lanes); field event facilities (long jump, triple jump, high jump, and shot-put); irrigation and drainage; security fencing, walls, gates; electronic scoreboard and associated landscape, hardscape, and infrastructure upgrades that qualify 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 Project will consist of the construction of a new regulation sized natural grass football/soccer field; decomposed granite track (six lanes); field event facilities (long jump, triple jump, high jump, and shot-put); irrigation and drainage; security fencing, walls, gates; electronic scoreboard and associated landscape, hardscape, and infrastructure upgrades. These structures are minor accessories to the existing Campus. Therefore, the Project satisfies the requirements of CEQA Guidelines Section 15311.

### Section 15314 – Minor Additions to Schools

Class 14 consists of minor additions to existing schools within existing school grounds where the addition does not increase original student capacity by more than 25% or ten classrooms, whichever is less. The addition of portable classrooms is included in this exemption.

The Project will consist of the construction of a new regulation sized natural grass football/soccer field; decomposed granite track (six lanes); field event facilities (long jump, triple jump, high jump, and shot-put);



# Los Angeles Unified School District

## Office of Environmental Health and Safety

irrigation and drainage; security fencing, walls, gates; electronic scoreboard and associated landscape, hardscape, and infrastructure upgrades. The Project will not include any new classrooms within existing school grounds nor will it increase original student capacity. Therefore, the Project satisfies the requirements of CEQA Guidelines Section 15314.

### 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 the City of Bell, surrounded by commercial shopping centers to the east, neighborhood commercial uses to the south, and residential neighborhoods to the west. The site is not designated as a biologically sensitive location. The nearest significant ecological area (SEA) is the Puente Hills SEA in Montebello located approximately 6.1 miles north of the Project site.<sup>3</sup> The nearest sensitive environment to the Project site is the Coastal California gnatcatcher habitat in Montebello located approximately 6.1 miles north of the Project site.<sup>4</sup> 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 proposed scope of work includes removal of trees. 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>5</sup> Additionally, written approval from the school principal will be required before any trees can be removed. If tree removal is scheduled to occur

<sup>3</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 July 2024.

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

<sup>5</sup> LAUSD OEHS, "Tree Trimming and Removal Procedure," <https://www.lausd.org/ceqa>



# Los Angeles Unified School District

## Office of Environmental Health and Safety

between February 1 and August 31, a nesting bird survey would be performed prior to removal activities, per SC-BIO-3.

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 concrete pavement, soil sampling and testing for characterization is required prior to earth moving work and removal of soil 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>6</sup> Furthermore, as set forth in SC-CUL-6, SC-CUL-7, SC-CUL-10, and SC-CUL-11, 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. Lastly, any construction and demolition waste shall be recycled to the maximum extent feasible per SC-USS-1. 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 a 7.5-mile portion of State Route 91 (SR-91), which is located approximately 22.5 miles southeast of the Campus.<sup>7</sup> 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.<sup>8</sup> 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.*

Bell HS has been determined to be eligible to be listed on the California Register of Historical Resources. In 2002, the buildings on the Campus were surveyed for historic eligibility. As a result of

<sup>6</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>7</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 July 2024.

<sup>8</sup> California Department of Toxic Substances, [http://www.dtsc.ca.gov/SiteCleanup/Cortese\\_List.cfm](http://www.dtsc.ca.gov/SiteCleanup/Cortese_List.cfm), accessed July 2024.

# Los Angeles Unified School District

## Office of Environmental Health and Safety

the survey, three buildings were identified as historically significant: the Administration Building, Shop Building I, and Gymnasium.

The Project at Bell HS was reviewed by LAUSD's Historic Preservation Specialist and Coordinator 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 to a historic district. The Historical Preservation Specialist and Coordinator 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.

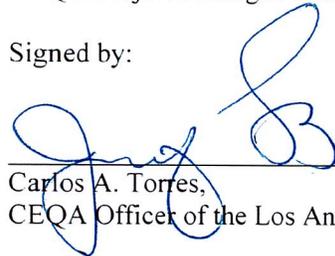
Prepared By:

Bryan Ramos Fernandez, AICP  
CEQA Project Manager/Contract Professional

Phone and Email:

(213) 241-4210  
cp-bryan.fernandez@LAUSD.net

Signed by:

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

Date:

8-21-2024  
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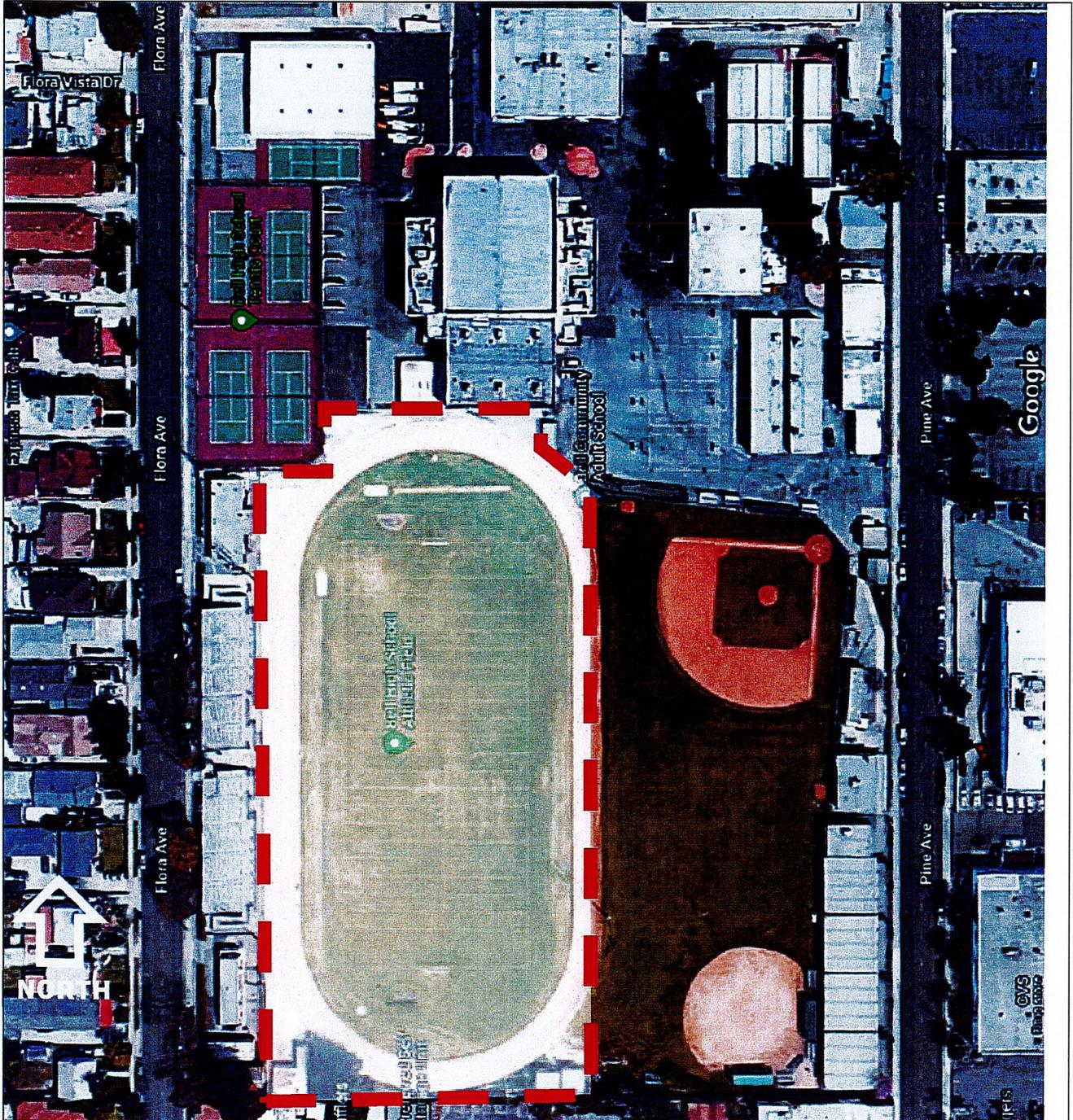
Dean C. Logan, Registrar - Recorder/County Clerk

Electronically signed by LILIA MURGUA

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## EXHIBIT A – CAMPUS SITE PLAN (not to scale)



2024 182405



FILED  
Aug 29 2024

Dean C. Logan, Registrar - Recorder/County Clerk

Electronically signed by LUISA MURGUA

 PROJECT SITE