

# 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 August 15 2023  
UNTIL September 14 2023  
REGISTRAR - RECORDER/COUNTY CLERK

2023 177799  
FILED  
Aug 15 2023  
Dean C. Logan, Registrar-Recorder/County Clerk  
Electronically signed by TINA TRAN

**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:**

Osceola Elementary School Underground Piping Replacement Project

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**Project Location – Specific:**

The Osceola Elementary School Underground Piping Replacement Project (Project) will be located on the 6.28-acre Osceola Elementary School (Osceola ES) campus. Osceola ES is located at 14940 Street in the Sylmar neighborhood of Los Angeles County. It is bounded by Osceola Avenue to the north, Rossiter Avenue to the east, Envoy Street to the south, and Youngdale Avenue to the west. The Project will occur throughout the campus.

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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 Project will replace deteriorated underground water and sewer pipes that serve the entire campus, as well as replace gas and irrigation lines. The pipes were originally installed in the 1950s and have reached the end of their useful life. The Project includes abandoning all underground piping, providing new underground water and sewer piping, and testing /commissioning of the entire system. The Project scope also includes providing new hot and cold-water lines in building soffits where leaks have been identified.

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) as adopted by the Board of Education in February 2019.<sup>1</sup> LAUSD's Standard Conditions of Approval (SCs), design guidelines, and best management practices are

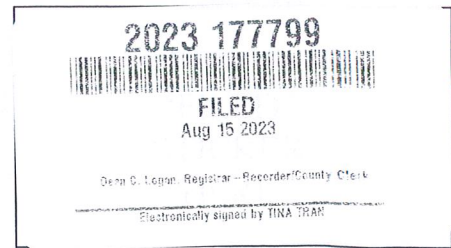
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<sup>1</sup> LAUSD OEHS, "Standard Conditions of Approval for District Construction, Upgrade, and Improvements Projects," Adopted by the Board of Education on February 5, 2019.

333 South Beaudry Avenue, 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.*



designed to be incorporated into the Project design in order to avoid or limit potential adverse impacts associated with the District's Projects. The primary purpose of the Project is to upgrade the Campus's water infrastructure. The beneficiaries of the Project include the Osceola ES students, faculty, staff, families, school supporters, 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 Section 38130-38139).

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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*
- 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.

Implementation of the proposed Project would replace deteriorated underground piping systems with a new in-kind system throughout the campus. The Project components would not present a new or expanded use of the Project site. Therefore, the Project constitutes minor alterations to an existing LAUSD campus that results in no expansion of use and meets the requirements of CEQA Guidelines Section 15301.

Section 15302 Replacement or Reconstruction

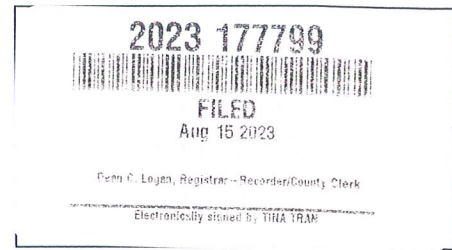
Class 2 consists of replacement or reconstruction of existing structures and facilities where the new structure will be located on the same site as the structure replaced and will have substantially the same purpose and capacity as the structure replaced.

The installation of the new water and sewer piping will replace the existing water and sewer piping system. The Project would not result in an increase or alteration of the current use, function, or capacity of the existing campus. Therefore, the Project satisfies the requirements of CEQA Guidelines Section 15302.

Section 15300.2 – Exceptions

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



Section 15300.2 of the CEQA Guidelines, Exceptions, provides conditions under which categorical exemptions are inapplicable. Review of the project indicates that construction and implementation 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.<sup>3</sup> The Project site is not designated as biologically sensitive location and does not contain sensitive resources or habitat that will be impacted by the Project. The nearest threatened or endangered species is the Southwestern willow flycatcher located approximately 3.9 miles east of the Project site. The nearest sensitive environment to the Project site is the Tujunga Valley/Hansen Dam, located approximately 3.5 miles to the east of the Project site.<sup>4,5</sup> The Project would occur entirely within the limits of the existing campus and underneath areas currently paved. 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 Project site is an active LAUSD campus and there will likely be ongoing maintenance activities and minor projects on the site to keep the school operational. As the Project will not result in any lasting impacts once construction of the Project is complete, the Project will 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. Additionally, 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>6</sup>

The Project includes 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. The Project involves the removal of asphalt and/or pavement, which requires soil sampling and testing for characterization prior to removal. Excavated soils will only be reused onsite if they are placed beneath paved areas. If construction or earthmoving activities require import or export of soils and materials, OEHS must be notified to provide oversight to ensure

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

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

<sup>6</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.



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>7</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>8</sup> Lastly, any construction and demolition waste shall be recycled to the maximum extent feasible per SC-USS-1 of the Program EIR.<sup>9</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 the Project site is Angeles Crest Highway, which is located approximately 15.5 miles east of the Project site.<sup>10</sup> In addition, 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 sites that are included on any list compiled pursuant to Section 65962.5 of the Government Code.<sup>11</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.*

Osceola ES is over 45 years old, meeting LAUSD's threshold for review as potential historic resources and requiring an evaluation for historic eligibility. LAUSD has identified Osceola ES as eligible for listing as a historic resource per Section 18955 of the California State Historical Building Code (CHBC).<sup>12</sup> Osceola ES appears to be a historic district eligible for the National Register of Historic Places, and the California Register of Historical Resources. Constructed in 1958, the Osceola Street Elementary School campus is an excellent example of the cluster-plan

<sup>7</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)

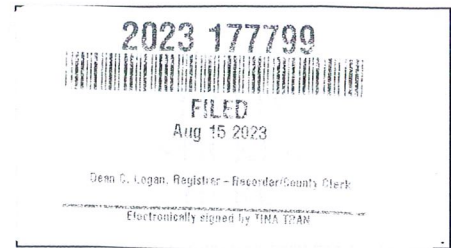
<sup>8</sup> LAUSD OEHS, "School Upgrade Program Final Environmental Impact Report," <http://achieve.lausd.net/ceqa>, Adopted by the Board of Education on November 10, 2015.

<sup>9</sup> *Ibid.*

<sup>10</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 2023.

<sup>11</sup> [http://www.dtsc.ca.gov/SiteCleanup/Cortese\\_List.cfm](http://www.dtsc.ca.gov/SiteCleanup/Cortese_List.cfm), accessed July 2023.

<sup>12</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.



school prevalent throughout the district at the time. The School's unified design layout with buildings arranged around landscaped courtyards is characteristic of school planning during the mid-century and reflects the district's development during a period of exponential growth in the San Fernando Valley<sup>13</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.

The Project at Osceola ES was reviewed by OEHS' 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)*). The Project does not alter or remove any of the contributing elements of the potential historic district (contributing buildings and landscape features) and will replace or repair underground piping, which is not character defining. 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:

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Signed by:

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

Date:

  
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Aug. 7, 2023

<sup>13</sup> Los Angeles Unified School District. 2020. Osceola Elementary School DPR 523A.

