

Los Angeles Unified School District

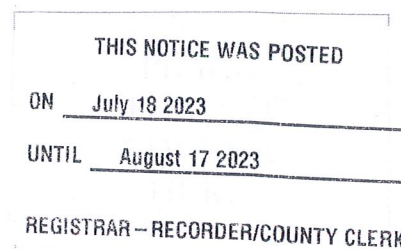
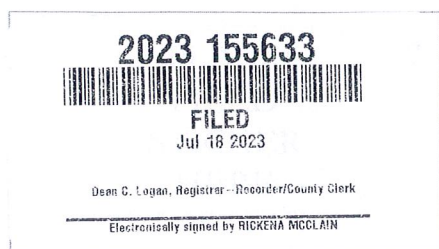
Office of Environmental Health and Safety

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



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:

LAUSD Proposition 39 Charter School Co-locations (2023-2024)

Project Location – Specific:

The proposed Project (Project) will be implemented pursuant to the Los Angeles Unified School District's (District) legal obligation under state law (referred to as "Proposition 39") to share its facilities fairly with charter schools that request them on an annual basis. After implementation of the Project at seven (7) campuses, the District will have a total of approximately 67 school campuses with co-located charter schools for the 2023-2024 school year. Specific Project sites are listed in Attachment A to this Notice of Exemption (NOE).

Project Location – City:

Various (see attached list)

Project Location – County:

Los Angeles

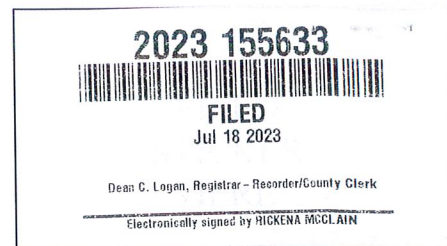
Description of Nature, Purpose, and Beneficiaries of Project:

The Project will consist of minor renovations and improvements necessary for charter schools to operate autonomously in spaces offered at existing District campuses. These "co-location" improvements will consist of the provision of new furniture, information technology (IT) improvements (public address, telephone, intrusion alarm, and data cabling), new computer equipment, security upgrades, fencing, and other minor improvements required to establish the charter school operations. The Project will also include minor improvements necessary to provide dedicated, gated pedestrian access and/or "drop-off" zones at the school sites for charter school students. In some cases, restrooms and walkways will be modified to comply with the Americans with Disabilities Act (ADA). No new building additions or permanent alterations of existing buildings are included as part of the Project. The Project will also include minor cosmetic repairs

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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.



at charter school co-location sites that will be fully vacated after the 2022-2023 school year. Attachment A categorizes the scope of work for each co-location site that has growth (from the previous year).

The Project will be implemented pursuant to all applicable State, federal, and local regulations and all applicable 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 as adopted by the Board of Education in February 2019.¹ LAUSD's standard conditions, 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 this Project are the District and charter schools' students, faculty, staff, families, school supporters, and the community at large who may request access to the school facilities and grounds pursuant to the Civic Center Act (CA Ed. Code Sections 38130-38139). Should the Project be altered from the improvements that are described above, LAUSD's Office of Environmental Health & Safety (OEHS) must be notified immediately to ensure that these activities are conducted in compliance with the required standards.

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*
 - *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.

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

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

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Dean C. Logan, Registrar - Recorder/County Clerk

Electronically signed by RICKENA MCCLAIN

The Project consists of the provision of new furniture, IT improvements (public address, telephone, intrusion alarm, and data cabling), new computer equipment, security improvements, fencing and other minor measures required to establish charter school operations at the various campuses listed in Attachment A. No new building additions or permanent alterations of existing buildings are included as part of the Project. These modernizations will entail minor modifications to structures consisting of wiring and installing equipment to support the IT improvements and to ensure security. Some projects will also include minor improvements necessary to provide dedicated, gated pedestrian access and/or a “drop-off” zone at the school site for charter school students. In some cases, restrooms and walkways will require minor modifications to comply with the ADA. The Project will not cause an increase in the schools’ capacity. Therefore, the Project constitutes minor exterior alterations to existing school sites that result in no expansion of use and is categorically exempt under Section 15301(a)(f) of the CEQA Guidelines.

All of the proposed Project components would involve minor alterations to existing campuses and will occur within the area occupied by existing facilities at the Project sites. The Project components will not present a new or expanded use of the Project sites. Therefore, the Project constitutes minor alterations to existing school sites that result 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.

The Project includes the upgrades and replacement of existing facilities including minor renovations to improve security such as dedicated/gated pedestrian access, and/or “drop-off” zones at school sites for charter students, modified fencing, reconstructions of the walkways and restrooms to comply with the ADA, and cosmetic repairs at charter school co-location sites that will be fully vacated after the 2022-2023 school year. No new building additions or permanent alterations of existing buildings are included as part of this Project. The Project will not involve an increase in capacity of the schools and is therefore categorically exempt under Section 15302(a) of the CEQA Guidelines.

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 structure; and the conversion of existing small structures from one use to another where only minor modifications are made in the exterior of the structure.

The Project activities include construction and renovation of fences, restroom and walkway modifications to comply with ADA requirements including curbs and ramps, wiring and equipment installation for IT improvements, gated pedestrian access, drop-off zones for charter students, and cosmetic repairs at charter school co-location sites that will be fully vacated after the 2022-2023 school year. The conversion of small structures from this Project will not include new buildings or permanent alterations of the existing buildings. Therefore, the Project is categorically exempt under Section 15303 of the CEQA Guidelines.



Section 15311 - Accessory Structures

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

The Project includes the replacement of minor structures that would be considered accessories to the existing institutional facilities, including the installation of restroom and walkway ADA facilities, fences, wiring and equipment installation for IT improvements, gated pedestrian access, and drop-off zones, and cosmetic repairs at charter school co-location sites that will be fully vacated after the 2022-2023 school year. The accessory structures are minor, and no new buildings or permanent alterations of the existing buildings are included as part of this Project. Therefore, the Project is categorically exempt under Section 15311 of the CEQA Guidelines.

Section 15300.2 – Exceptions

Section 15300.2 of the CEQA Guidelines, Exceptions, provides conditions under which categorical exemptions are inapplicable. Review of these projects indicates that they would not violate any of the exceptions, as described below.

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

The Project sites are fully developed campuses within urbanized communities³. None of the Project sites have been designated as biologically sensitive locations. 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 will not be expected to result in significant cumulative environmental impacts. As active school campuses, it is anticipated that projects such as routine maintenance activities or upgrades will occur on the campuses in the future. However, there are currently no known successive projects of the same type or scale planned for the campuses. As required by Proposition 39, LAUSD goes through a process of offering charter co-location facilities on an annual basis. This process results in the need to implement minor physical improvements to existing school campuses, which taken together over time do not have the potential to result in an impact that is cumulatively considerable. Therefore, no cumulative impacts will occur as a result of the Project.

3. *There is a reasonable possibility that the activity would have a significant effect on the environment due to unusual circumstances.*

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



There are no known unusual circumstances that will have a significant effect on the environment; however, co-location of charter schools on existing school campuses may require the accommodation of passenger loading and drop-off for the vehicles providing transportation for charter school students. In accordance with LAUSD's Office of Environmental Health and Safety (OEHS) Reference Guide, 4492.2, School Traffic Safety, prior to the 2023-2024 school year, the administrator of the District school and the co-located charter school administrator meet to discuss issues regarding pedestrian safety, passenger drop-off and pick-up and other related issues. During this meeting, the District's site administrators shall inform the co-located charter administrator of designated drop off/pick-up points, traffic and pedestrian safety rules/tips, and disseminate the pedestrian routes to school maps, if they are made available by the local transportation agency. Safe Routes to School Maps and supplemental traffic safety tips/resources are available under the Safe School Traffic Program section of the OEHS website.

OHES also recommends that during this meeting the administrators discuss the following: 1) the existing neighborhood and charter schools stagger their respective start and end times to diffuse traffic during pick-up/drop-off; and/or 2) that the charter schools utilize separate loading zones for pick-up/drop-off. OEHS also recommends that the charter school implement its own dedicated Safety Valet Program during morning drop-off to facilitate the unloading of students in an efficient and safe manner and provide clear guidance for vehicle queuing and direction and procedures for unloading. This Program should be executed pursuant to OEHS Reference Guide: "Implementing a Safety Valet Program at Schools (Ref-5496.1)." This Guide is available at <http://lausd-oehs.org/docs/ReferenceGuides/REF-5496.1.pdf>.

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, then LAUSD's 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. Compliance with District specifications would ensure that there is not a reasonable possibility that the project would have a significant effect on the environment due to unforeseen circumstances.

Consideration must be given to the management of excavated soils and/or to the earthwork activities involving more than 50 cubic yards of soil for the Project. If construction or earthmoving activities require import or export of soils and materials, OEHS must be notified to provide oversight to ensure that the import and/or export of soils are conducted in compliance with the requirements of District Specification Section 01 4524.⁴ Since earthwork activities involve the disturbance of more than 50 cubic yards, OEHS directed the completion of sampling and analysis of underlying soils which provides guidance to ensure compliance with South Coast Air Quality Management District (SCAQMD) Rule 1466. Any variances for compliance with Specification Section 01 4524 and SCAQMD Rule 1466 must be approved by OEHS.

Furthermore, as set forth in LAUSD's SC-CUL-7, SC-CUL-9, SC-CUL-10, and SC-CUL-11⁵ construction activities must be stopped immediately and OEHS notified upon discovery of

⁴ http://www.laschools.org/documents/file?file_id=219798234&show_all_versions_p=t

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



subsurface features, such as buried resources (i.e., paleontological resources, archaeological resources), tanks or seepage pits or stained/odoriferous soils. Construction and demolition waste shall be recycled to the maximum extent feasible per SC-USS-1 of the Program EIR.⁶ 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;*

There are no officially designated state scenic highways within the vicinity of any of the Project locations.⁷ 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 will be located on sites that are currently operating schools that have been deemed safe for occupancy. 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.*

LAUSD has identified both Bret Harte Preparatory Middle School and West Vernon Avenue Elementary School as eligible for listing as a historic resource per Section 18955 of the California State Historical Building Code (CHBC).⁸ As with all LAUSD-owned properties that are considered historic resources under CEQA, LAUSD would assess the proposed Project in accordance with the State CEQA Guidelines and further ensure that the proposed Project is evaluated for conformance with the Secretary of the Interior's (SOI's) *Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring and Reconstructing Historic Buildings* (Standards) by a Qualified Architectural Historian or professional who meets the SOI's Professional Qualifications Standards and would further ensure that the proposed project would not cause a substantial adverse change in the significance of a historic resource. LAUSD's proposed improvements would be designed with the support and input of a Qualified Architectural Historian and reviewed by DSA to ensure that there would be no potential adverse impacts on the character defining features associated of these Campuses. The Project entails minor, reversible modifications to structures, including wiring and installing equipment to support IT improvements and to ensure security. No new building additions or permanent alterations of existing buildings are included as part of the Project. As such, the proposed Project will not cause a substantial adverse change in the significance of a historic resource.

⁶ *Ibid.*

⁷ California Department of Transportation. California Scenic Highway Mapping System. Available at: http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/index.htm. Accessed May 2023.

⁸ 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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Signed by:

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

Date:

