

Los Angeles Unified School District

Office of Environmental Health and Safety

ALBERTO M. CARVALHO
Superintendent of Schools

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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:

Outdoor Learning Environment Projects and Campus Upgrades at Five LAUSD Campuses

Project Location – Specific:

- 2nd Street Elementary School, 1942 East 2nd Street, Los Angeles, CA 90033
- Christopher Dena Elementary School, 1314 Dacotah Street, Los Angeles, CA 90023
- Martin Luther King Jr. Elementary School, 3989 S. Hobart Boulevard, Los Angeles, CA 90062
- Vine Street Early Education Center, 6312 Eleanor Avenue, Los Angeles, CA 90038
- Weigand Avenue Elementary School, 10401 Weigand Avenue, Los Angeles, CA 90002

Project Location – City:

Los Angeles

Project Location – County:

Los Angeles

Description of Nature, Purpose, and Beneficiaries of Project:

The proposed Outdoor Learning Environment (OLE) projects (Project) will create field-tested, research-based outdoor learning spaces that provide learning opportunities and support children's interaction with the natural world at five LAUSD campuses – four elementary schools and one early education center (Campuses). The OLEs will be divided into distinct activity areas to provide a wide-ranging mix of educational activities that support children with a variety of needs and learning styles. The table below describes the improvements at each campus:

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School	Removal of Relocatable Classroom(s)	Outdoor Classrooms	ADA Restroom Upgrades	Resurface Parking Lot for ADA Compliant Path of Travel
24th Street ES	X	X	X	X
Dena ES	X	X	X	X
Martin Luther King ES	X	X	X	X
Weigand ES	X	X	X	X
Vine Street EEC	X	X	X	X

Each Project will include the removal of one or two excess relocatable buildings (up to 2 classrooms maximum) and adjacent asphalt to provide additional green space on the school by constructing an approximately 2,000 square foot outdoor learning space with landscaping, shaded seating areas, shade structure, internet connectivity, a sink, and accessibility improvements. Each Project site will be individually designed, but will include a mix of the following components:

- Landscape (trees & pavers) and irrigation system
- Shaded seating areas
- Shade structure
- Internet connectivity
- Outdoor sink
- Informational signage, chalkboard, storage, etc.
- Restoration of existing landscape and/or hardscape impacted by the Outdoor Learning Environment to meet DSA and LAUSD standards
- Utility connections (i.e., water, electrical, etc.) as needed to support the OLE
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The Projects will also address critical Americans with Disabilities Act (ADA) upgrades needed at the Campuses that will include, but not be limited to, resurfacing the parking areas to provide an ADA compliant path(es) of travel; providing an ADA compliant restroom(s); and upgrades to the drinking water stations.

The Projects 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 provide outdoor learning experiences, as well as provide upgrades to school building/site systems that have reached or exceeded their service life. The Project will not cause an increase in student capacity or enrollment and would not result in an increase in the intensity of use. The beneficiaries of the Project include students and staff at each of the respective schools 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 15304 – Minor Alterations to Land*
- ☐ 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.

Construction of the OLEs will convert a part of existing asphalt and playground areas into nature-based learning environments. As such, the Project would constitute operation, repair, maintenance and minor alteration of existing public facilities involving no expansion of the facilities' use.

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.

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

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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 15304 – Minor Alterations to Land

Class 4 consists of minor public or private alterations in the condition of land, water, and/or vegetation which do not involve the removal of healthy, mature, scenic trees except for forestry and agricultural purposes.

The Project will involve minor alterations to land including the removal of asphalt and its replacement with dynamic outdoor classrooms on the Campuses. The outdoor classrooms will be designed to enable the District's youngest learners to acquire a deep, intuitive understanding of the natural world through hands-on experiences. The Project also incorporates ADA features to improve accessibility on the campuses. The Projects are designed such that there would be no removal of any trees or vegetation. As such, the removal of trees will not be required as a part of the Project. The Project will include the installation of new vegetation and classroom gardens as part of the OLEs. Therefore, the Project fulfills the requirements of CEQA Guidelines Section 15304.

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 communities.³ None of the Project sites have been designated as biologically sensitive locations. The nearest threatened or endangered species is the Coastal California gnatcatcher located approximately 2 miles north of Vine Street Early Education Center. The nearest sensitive environment to the Project site is the Puente Hills, located approximately 7.75 miles northeast of 2nd Street Elementary School.^{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 Campuses are active school sites and there will likely be ongoing maintenance activities and minor Projects to keep them operational. As the Projects will not result in any lasting impacts once construction is complete, they will not contribute to cumulative impacts when considered with expected successive projects.

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

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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 Projects are 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 Projects 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 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 for all Campuses prior to demolition and removal of the paving materials. 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 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;*

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

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.*

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The closest designated state scenic highway is the State Route 2 (SR2), which is located approximately 12.8 miles north of 2nd Street Elementary School.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*

None of the Project sites are located on sites that are 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.*

Two of the Project sites (2nd Street Elementary School and Martin Luther King Elementary School) are listed on the California Register of Historical Resources. The Project entails minor, reversible modifications to the existing playground and ADA upgrades, including an accessible path of travel and restroom and drinking water station upgrades. The proposed modifications are limited to spaces that are not considered character-defining and comply with the Secretary of the Interior's Standards for Rehabilitation due to their compatibility and reversibility. Therefore, the Projects do not have the potential to adversely impact historical resources.

Prepared By:

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Signed by:



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

Date:



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

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