

# 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 February 13 2026

UNTIL March 16 2026

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:

Outdoor Classroom and Campus Upgrade Projects at Three LA Unified Campuses

#### Project Locations – Specific:

- Ethel Bradley Early Education Center, 10925 S. Central Avenue, Los Angeles, Calif.
- Esther Collins Early Education Center, 901 W. 52nd Street, Los Angeles, Calif.
- David Roberti Early Education Center, 1156 E. Vernon Avenue, Los Angeles, Calif.

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#### Project Location – City:

Los Angeles

#### Project Location – County:

Los Angeles

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

The projects (Project or Projects) at the three LA Unified campuses (Campus or Campuses) provides for new outdoor classrooms by dividing existing playground areas into distinct activity areas. The Projects include replacing existing playground matting and equipment and installing new landscaping. The scope of work at Ethel Bradley Early Education Center (Bradley EEC) and David Roberti Early Education Center (Roberti EEC) includes replacing existing playground matting; installing new trees, native plants, and shrubs with irrigation upgrades; resodding existing grass areas; new paving and solar reflective coating; and modifications to the playground area. The Project at Esther Collins Early Education Center (Collins EEC) will include a new heating, ventilation, and air conditioning unit and roofing at the Children's Center Building, as well as necessary upgrades to the fire alarm system and utilities. The Board of Education authorized \$2,635,299 on August 26, 2025, for the Projects at Bradley EEC and Roberti EEC and authorized \$5,983,619 on October 22, 2024, for the Project at Collins EEC.

Minor work at each of the Campuses will include improvements to ensure compliance with local, state, and federal requirements including those of the American with Disabilities Act (ADA), Division of State Architect (DSA), and Department of Toxic Substances Control (DTSC).

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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.*



The Projects will establish nurturing, nature-based outdoor spaces that support whole-child development and learning, as well as address early education facilities needs that are necessary to improve student health, safety, and educational quality. The Projects will be implemented per all applicable local and State regulations, as well as all District Standards and Specifications, such as those provided in LA Unified's Subsequent Program Environmental Impact Report for the School Upgrade Program (Subsequent PEIR).<sup>1</sup> The Projects 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 each 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).

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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

**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 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.

All Projects include replacing existing playground matting and equipment and new landscaping. The scope of work at Bradley EEC and Roberti EEC includes replacing existing playground matting; installing new trees, native plants, and shrubs with irrigation upgrades; resodding existing grass areas; new paving and solar reflective coating; and modifications to the playground area. The Project at Collins EEC will include a new heating, ventilation, and air conditioning unit and roofing at the Children's Center Building, as well as necessary upgrades to the fire alarm system and utilities. All proposed Project components would involve minor alterations to an existing Campus and will occur within the area occupied by existing facilities at the Campus. The Project components will not present a new or expanded use of the Campus. 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.

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<sup>1</sup> LAUSD OEHS, "School Upgrade Program Final Subsequent Program Environmental Impact Report (SPEIR)," <https://www.lausd.org/ceqa>, adopted by the Board of Education on December 12, 2023.

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

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### 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.

All Projects include replacing existing playground matting and equipment and new landscaping. The scope of work at Bradley EEC and Roberti EEC includes replacing existing playground matting; installing new trees, native plants, and shrubs with irrigation upgrades; resodding existing grass areas; new paving and solar reflective coating; and modifications to the playground area. The Project at Collins EEC will include a new heating, ventilation, and air conditioning unit and roofing at the Children’s Center Building, as well as necessary upgrades to the fire alarm system and utilities. Removal of scenic trees will not be required as a part of the Project. Therefore, the Project meets 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 located within fully developed campuses within urbanized neighborhoods in South Los Angeles.<sup>3</sup> The Campuses are not designated as biologically sensitive locations. The nearest threatened or endangered species is the Coastal California gnatcatcher located approximately 8.9 miles east of Roberti EEC. The nearest sensitive environment to the Project site is the Puente Hills Significant Ecological Area located approximately 9.5 miles north of Roberti EEC in Montebello.<sup>4,5</sup> 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. There are currently no known successive projects of the same type or scale planned for the Campuses. 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 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 anticipated as part of the proposed scopes of work at Bradley EEC and

<sup>3</sup> Southern California Association of Governments (SCAG), 2019 Annual Land Use (ALU v.2019.2), <https://arcg.is/1SqnKm>, accessed January 2026.

<sup>4</sup> United States Fish and Wildlife Service Critical Habitat Portal, <https://ecos.fws.gov/ecp/report/table/critical-habitat.html>, accessed January 2026.

<sup>5</sup> Los Angeles County Department of Regional Planning, [https://rpgis.isd.lacounty.gov/Html5Viewer/index.html?viewer=GISNET\\_Public.GIS-NET\\_Public](https://rpgis.isd.lacounty.gov/Html5Viewer/index.html?viewer=GISNET_Public.GIS-NET_Public), accessed October 2025.



Collins EEC. Should the Project be altered to include the removal of trees at Roberti EEC, LA Unified'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.<sup>6</sup>

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 related ground disturbing activities would comply with SC-AQ-1, SC-AQ-2, SC-AQ-3, and SC-AQ-4. As the Project involves the removal of asphalt and concrete pavement, soil sampling and testing has or will be conducted and a determination memorandum will be created for the affected Campus 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.<sup>7</sup> Furthermore, as set forth in SC-CUL-7, SC-CUL-9, SC-CUL-10, and SC-CUL-11 and in District protocols, 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.<sup>9</sup> 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 Angeles Crest Scenic Highway, a 55.1-mile portion of State Route 2 (SR-2), which is located approximately 15.9 miles north of Roberti EEC.<sup>10</sup> 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*

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<sup>6</sup> LAUSD OEHS, "Standard Conditions of Approval for District Construction, Upgrade, and Improvements Projects," available at [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>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>9</sup> *Ibid.*

<sup>10</sup> Los Angeles County Department of Regional Planning, [https://gis.planning.lacounty.gov/GIS-NET3\\_Public/Viewer.html](https://gis.planning.lacounty.gov/GIS-NET3_Public/Viewer.html). Accessed October 2025.



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.<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.*

Bradley EEC and Roberti EEC opened in 2003 and 2001 respectively, and therefore ineligible to be considered as historic resources. Collins EEC opened in 1961. LA Unified's Historic Preservation Specialist and Coordinator has determined that the Campus does not appear to be eligible for listing on the National Register of Historic Places or the California Register of Historical Resources. Therefore, the Project would have no impact to a historic resource.

Prepared By:

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Signed by:

Date:

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

Attachment: Exhibits A-C – Site Plans

<sup>11</sup> California Department of Toxic Substances Control. DTSC Databases. Available at: <https://dtsc.ca.gov/dtscs-cortese-list/> Accessed October 2025.

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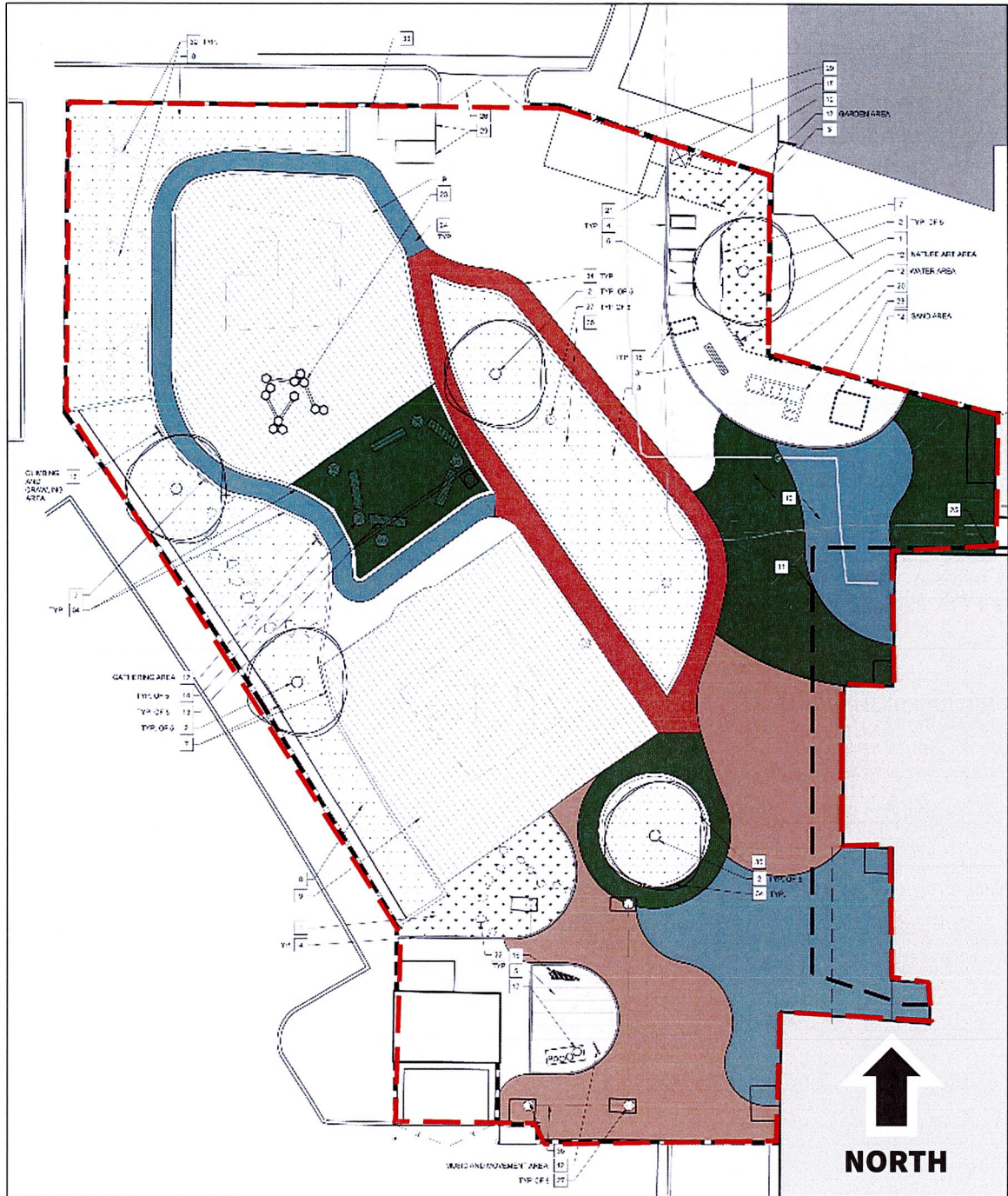


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### EXHIBIT A – BRADLEY EEC SITE PLAN (not to scale)



 PROJECT SITE

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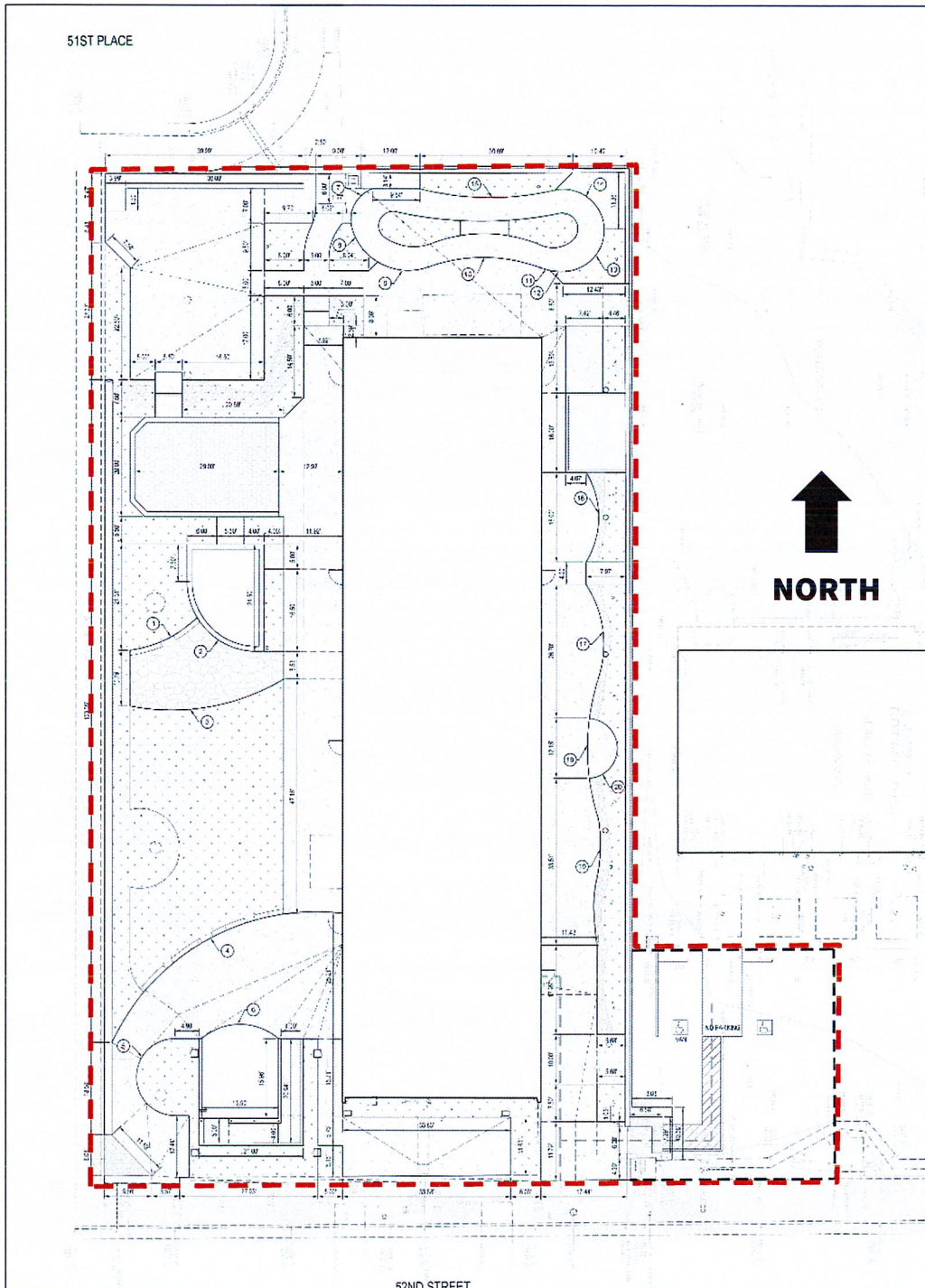


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### EXHIBIT B – COLLINS EEC SITE PLAN (not to scale)



 PROJECT SITE

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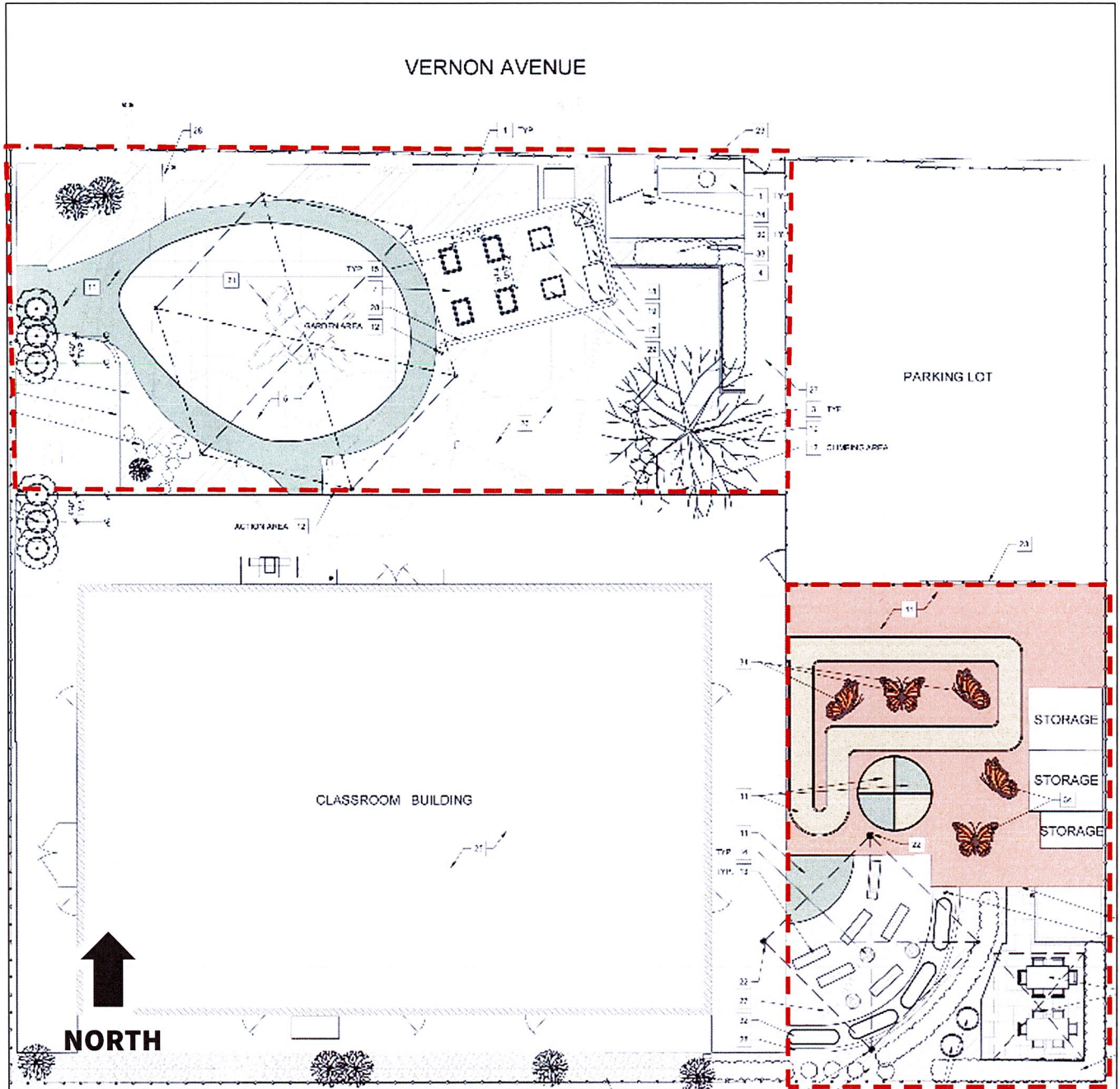
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### EXHIBIT C – ROBERTI EEC PLAN (not to scale)



 PROJECT SITE