

Los Angeles Unified School District

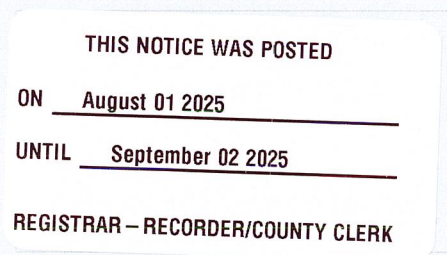
Office of Environmental Health and Safety

ALBERTO M. CARVALHO
Superintendent of Schools

NOTICE OF EXEMPTION

CARLOS A. TORRES
Director, Environmental Health and Safety

JENNIFER FLORES
Deputy Director, Environmental Health and Safety



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:

John Marshall High School Synthetic Field Replacement Project

Project Location – Specific:

The John Marshall High School Synthetic Field Replacement (Project) is located at 3939 Tracy Street in the Los Feliz neighborhood of the City of Los Angeles. It is bound by Rowena Avenue to the north, Griffith Park Boulevard to the east, Saint George Street to the south, and Tracy Street to the west. The Project will occur on the 1.8-acre existing football field at John Marshall High School (Marshall HS or Campus). The Campus is located in a highly-urbanized community primarily consisting of residential uses.

Project Location – City:

Los Angeles

Project Location – County:

Los Angeles

Description of Nature, Purpose, and Beneficiaries of Project:

The Project will remove and replace approximately 80,000 square feet of synthetic turf that has reached the end of its useful life on the existing football field at Marshall HS and will include new perimeter drainage, field cooling system, repair of the track, accessibility upgrades to the bleachers, and five new field lights (Exhibit A). The Project will include asphalt removal in the existing parking areas. The Board of Education approved the Project's budget of \$5,887,414 on November 14, 2023

Minor work 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).

The Project will be implemented pursuant to all applicable State, federal, and local regulations and all applicable Los Angeles Unified School District (LA Unified or District) 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

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Board of Education on December 12, 2023.¹ LA Unified's SCs, design guidelines, and best management practices are designed to be incorporated into the Project design to avoid or limit potential adverse impacts associated with the District's projects.

The beneficiaries of the Project include John Marshall High School's 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 upgraded athletic facilities, once completed, will provide modern high-performance athletic facilities that support physical educational programs, student athletic achievement, and allow the school to host athletic events and other school community events. In 2023-2024, the athletic program of Marshall HS included 485 students and 13 sports.

Name of Public Agency Approving Project:

Los Angeles Unified School District

Name of Person or Agency Carrying Out Project:

Los Angeles Unified School District

2025 158161



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Aug 01 2025

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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 Minor Alterations*
 - *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.

The Project will remove and replace approximately 80,000 square feet of synthetic turf on the existing football field and will include new perimeter drainage, field cooling system, repair of the track, accessibility upgrades to the bleachers, and five new field lights. The Project will include asphalt removal in the existing parking areas. 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.

¹ 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

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

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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 remove and replace approximately 80,000 square feet of synthetic turf on the existing football field and will include new perimeter drainage, field cooling system, repair of the track, accessibility upgrades to the bleachers, and five new field lights. The Project will include asphalt removal in the existing parking areas. 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 remove and replace approximately 80,000 square feet of synthetic turf on the existing football field and will include new perimeter drainage, field cooling system, repair of the track, accessibility upgrades to the bleachers, and five new field lights. The Project will not include work on or within any structures. Therefore, the Project fulfills 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 remove and replace approximately 80,000 square feet of synthetic turf on the existing football field and will include new perimeter drainage, field cooling system, repair of the track, accessibility upgrades to the bleachers, and five new field lights. The Project will not include work on or within any structures. Therefore, the Project fulfills the requirements of CEQA Guidelines Section 15311.

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 Los Feliz and is surrounded by predominantly residential uses. The site is not designated as a biologically sensitive location. The nearest significant ecological area (SEA) is the Griffith Park SEA in Los Angeles located approximately 0.67 miles east of the Project site.³ The nearest sensitive environments to

³ Los Angeles County Department of Regional Planning, http://gis.planning.lacounty.gov/GIS-NET3_Public/Viewer.html, accessed July 2025.

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the Project site are the Southwestern willow flycatcher habitat at Hansen Dam and California Costal gnatcatcher in Montebello located approximately 11.7 miles north and south of the Project site respectively.⁴ 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 Project does not include the removal of trees. Should the Project be altered to include the removal of trees, OEHS must be notified immediately. 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.⁵ 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 SC-BIO-3.

The Project will include 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 soil associated with earthwork activities for the Project. Since the Project involves the removal of pavement and soil disturbing activities, soil sampling and testing for characterization is required prior to these activities. 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.⁶ 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

⁴ United States Fish and Wildlife Service Critical Habitat Portal, <https://ecos.fws.gov/ecp/report/table/critical-habitat.html> accessed July 2025.

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

⁶ LAUSD OEHS, "Section 01 4524 Environmental Import/Export Materials Testing", http://www.laschools.org/documents/file?file_id=219798234&show_all_versions_p=t



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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 the Angeles Crest Scenic Highway, a 55.1-mile portion of State Route 2 (SR-2), which is located approximately 9.5 miles north of the Campus in the San Gabriel Mountains.⁷ 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 65962.5.⁸ 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.*

John Marshall HS is eligible for the National Register of Historic Places and listed on the California Register of Historical Resources as a historic district. The historic district consists of four contributing resources, including the Administration Building and East Wing, Auditorium, Gymnasium, and Shop Building.

The Project at Marshall HS was reviewed by LA Unified'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). This review found that the Project components are limited to modifications to the football field area, which is not a contributing element to the historic district. The Historic 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:

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⁷ Los Angeles County Department of Regional Planning, http://gis.planning.lacounty.gov/GIS-NET3_Public/Viewer.html, accessed July 2025.

⁸ California Department of Toxic Substances, http://www.dtsc.ca.gov/SiteCleanup/Cortese_List.cfm, accessed June 2025.



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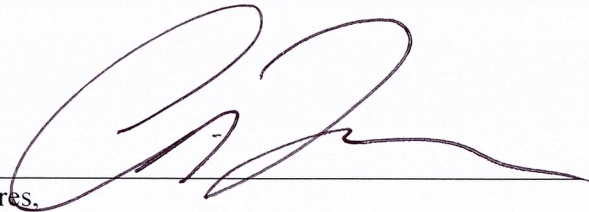
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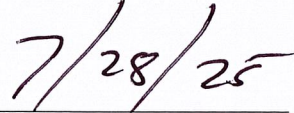
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Signed by:

Date:



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



7/28/25

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EXHIBIT A – CAMPUS SITE PLAN (not to scale)



PROJECT SITE