

# 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                                | December 06 2024 |
| UNTIL                             | January 06 2025  |
| REGISTRAR – RECORDER/COUNTY CLERK |                  |

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| 2024 248394   |
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| FILED   |
| Dec 06 2024   |
| 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  
21st Floor  
Los Angeles, CA 90017

**Project Title:**  
Community Partner Greening Projects at eight LA Unified Campuses

**Project Location – Specific:**

- 118th Street Elementary School - 144 East 118th Street, Los Angeles, CA 90061
- Diego Rivera Learning Complex – 6100 South Central Avenue, Los Angeles, CA 90001
- Harmony Elementary School – 899 East 42<sup>nd</sup> Place, Los Angeles, CA 90011
- Holmes Avenue Elementary School – 5108 Holmes Avenue, Los Angeles, CA 90058
- Miramonte Elementary School – 1400 East 68<sup>th</sup> Street, Los Angeles, CA 90001
- Primary Academy for Success School – 9075 Willis Avenue, Panorama City, CA 91402
- Rosa Parks Learning Center – 8855 Noble Avenue, North Hills, CA 91343
- Thomas Alva Edison Middle School – 6500 Hooper Avenue, Los Angeles, CA 90001

**Project Location – City:**  
Los Angeles

**Project Location – County:**  
Los Angeles

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

The scope of the Project consists of the removal of asphalt and replacement with nature-based designs and greening improvements, including installation of accessible path of travel; decomposed granite; tree plantings; outdoor classrooms; gardens; and natural playgrounds at eight Los Angeles Unified School District (LA Unified or District) school campuses; 118<sup>th</sup> St. Elementary School (ES), Rivera Learning Complex (LC), Harmony ES, Holmes ES, Miramonte ES, Primary Academy, Rosa Parks Learning Center (LC), and Edison Middle School (MS) (Campuses) (Project). This greening project is for planning activities related to potential future green schoolyard improvements at the school (Figures 1 through 8). The community partner proposing the project, the Council of Watershed Health, was awarded a grant in the amount of \$1,583,975.87 provided by the State of California Department of Forestry and Fire Protection (Cal Fire) Resource Management Grant Program. The grant will fund the Project's planning costs including soils and asphalt testing, underground utility survey, and design up to 50% construction documents. The table below summarizes the various greening improvements that would occur at each school as part of the Project.

### Summary of Proposed Greening Improvements at Each School

| School          | Asphalt Pavement Removal | Accessible Path of Travel | Tree Planting | Natural Playground | Shade Structure | Edible Garden | Microforest | Decomposed Granite Area | Planting Area | Outdoor Classroom | Reading Garden | Native Habitat | Amphitheater | Rain Garden |
|-----------------|--------------------------|---------------------------|---------------|--------------------|-----------------|---------------|-------------|-------------------------|---------------|-------------------|----------------|----------------|--------------|-------------|
| 118th St ES     | ●                        | ●                         | ●             | ●                  | ●               | ●             | ●           | ●                       |               |                   |                |                |              |             |
| Rivera LC       | ●                        | ●                         | ●             |                    |                 | ●             |             | ●                       | ●             |                   |                |                |              |             |
| Harmony ES      | ●                        |                           | ●             | ●                  |                 | ●             |             | ●                       | ●             |                   |                |                |              |             |
| Holmes ES       | ●                        |                           | ●             | ●                  | ●               | ●             |             | ●                       | ●             |                   |                |                |              |             |
| Miramonte ES    | ●                        |                           | ●             | ●                  |                 | ●             |             | ●                       | ●             | ●                 | ●              | ●              | ●            |             |
| Primary Academy | ●                        | ●                         | ●             | ●                  | ●               |               |             | ●                       | ●             |                   |                | ●              |              |             |
| Rosa Parks LC   | ●                        | ●                         | ●             | ●                  | ●               |               |             | ●                       |               |                   |                | ●              |              | ●           |
| Edison MS       | ●                        |                           | ●             |                    |                 | ●             | ●           | ●                       | ●             | ●                 |                |                |              |             |

The Project will be constructed per DSA-approved plans. 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 the updated Standard Conditions of Approval for District Construction, Upgrade, and Improvements Projects (SCs) as adopted by the Board of Education in December 2023.<sup>1</sup>

The primary purpose of the Project is to provide greening improvements and to design green schoolyards. The Project would 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 each Campus 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

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<sup>1</sup> LAUSD OEHS, "Standard Conditions of Approval for District Construction, Upgrade, and Improvements Projects" <http://achievetr.lausd.net/ceqa>. Adopted by the Board of Education on December 12, 2023.



**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*
  - *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.

The Project consists of the removal of asphalt and replacement with nature-based designs and greening improvements. Such improvements may include installation of accessible path of travel; tree planting; installation of natural playgrounds; installation of shade structures; installation of edible gardens; installation of microforests; installation of decomposed granite areas; installation of planting areas; installation of outdoor classrooms; installation of reading gardens; installation of native habitats; installation of an amphitheater; and installation of rain gardens at eight LA Unified Campuses.

All of the proposed Project components would involve minor alterations to existing public structures and would occur within the area occupied by existing facilities at the Project sites. The Project components would 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 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 Project includes upgrades or replacement of existing structures and facilities, such as the removal of asphalt and replacement with nature-based designs and greening improvements. The Project would not change the location, or the purpose of the structures and facilities being replaced and will not expand the capacity of the Campuses. Therefore, the Project satisfies the requirements of CEQA Guidelines Section 15302.

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.

Construction of the Project will result in the removal of asphalt and the planting of new trees and shrubs on improved greening areas such as native habitats, gardens, and outdoor classrooms on existing Campuses. The Project will include the installation

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



of new vegetation, irrigation, and decomposed granite as 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 the Project indicates that they would not violate any of the exceptions, as described below.

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

The Project sites are fully developed Campuses within urbanized communities.<sup>3</sup> The Project sites are not designated as biologically sensitive locations. The nearest sensitive environment to the Project sites is an area supporting the Southwestern willow flycatcher, located approximately 4.2 miles northeast of Primary Academy, and the Tujunga Valley/Hansen Dam, located 3.25 miles east of Primary Academy.<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 on the Campuses to keep the schools operational. 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.

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, 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. All tree trimming and removal conducted on District property is required to adhere to the procedures described in the OEHS Tree Trimming and Removal Procedure.<sup>6</sup> 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 of Approval (SC) SC-BIO-3 of the Subsequent Program Environmental Impact Report (SPEIR).<sup>7</sup>

The Project may include 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. As the Project involves the removal of pavement, soil sampling and testing for characterization is required prior to demolition and removal of the paving materials. 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

<sup>3</sup> City of Los Angeles Planning Department, *Zoning and Information Management System*, <http://zimas.lacity.org/>, accessed October 2024.

<sup>4</sup> United States Fish and Wildlife Service Critical Habitat Portal, <https://ecos.fws.gov/ecp/report/table/critical-habitat.html> accessed October 2024.

<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 October 2024.

<sup>6</sup> LAUSD OEHS, "Tree Trimming and Removal Procedure," <https://achieve.lausd.net/ceqa>

<sup>7</sup> LAUSD OEHS, "Standard Conditions of Approval for District Construction, Upgrade, and Improvements Projects" <http://achieve.lausd.net/ceqa>. Adopted by the Board of Education on December 12, 2023.



District Rule 1466, and other applicable environmental agency rules and requirements.<sup>8</sup> Furthermore, as set forth in SC-CUL-6, SC-CUL-7, SC-CUL-10, and SC-GEO-2 of the SPEIR, 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>9</sup> Lastly, any construction and demolition waste shall be recycled to the maximum extent feasible per SC-USS-1 of the SPEIR.<sup>10</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 any of the Project sites is State Route 2 (SR2), which is located approximately 15.7 miles southeast of Rosa Parks LC.<sup>11</sup> 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*

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>12</sup> Therefore, the Project would 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 historical resource.*

118th St ES, Rivera LC, Harmony ES, Primary Academy, Rosa Parks LC, and Edison MS are not eligible for federal, state, or local listing under any of the applicable criteria and are therefore not considered to be historical resources pursuant to CEQA. Therefore, Project activities at these schools would not cause a substantial adverse change in the significance of a historic resource.

LA Unified has identified Holmes ES and Miramonte ES as eligible for listing as a historic resource per Section 18955 of the California State Historical Building Code (CHBC).<sup>13</sup> The scope of the Project is well outside the Campus' area of historic eligibility and would not affect the historic eligibility of the campus. Therefore, OEHS' Historic Preservation Specialist has determined that the Project will not be expected to materially impair the significance of the historic resource and therefore will not be expected to cause a substantial adverse historic impact.

Should the scope of the Project activities be altered from the components that are described above, standard District 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.

<sup>8</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> LAUSD OEHS, "School Upgrade Program Final Subsequent Environmental Impact Report," <http://achieve.lausd.net/ceqa>, Adopted by the Board of Education on December 12, 2023.

<sup>10</sup> *Ibid.*

<sup>11</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 October 2024.

<sup>12</sup> [http://www.dtsc.ca.gov/SiteCleanup/Cortese\\_List.cfm](http://www.dtsc.ca.gov/SiteCleanup/Cortese_List.cfm), accessed October 2024.

<sup>13</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.



Prepared By:

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Signed by:

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

Date:

Figure 1 – 118th St ES Site Plan

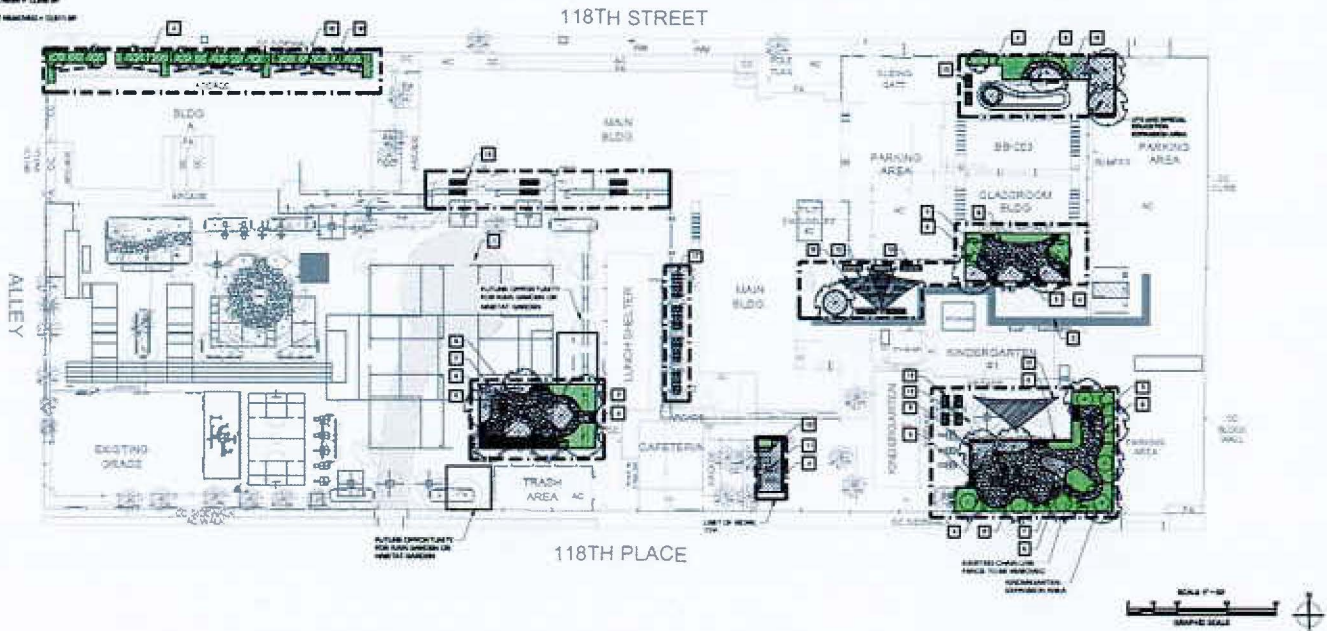
KEYNOTES

- 1 FIRE LANE, TYP.
- 2 ACCESSIBLE PATH OF TRAVEL, TYP.
- 3 CONCRETE LANDING, TYP.
- 4 REDWOOD EDGING, TYP.
- 5 NATURAL PLAYGROUND ELEMENTS - FUTURE PHASE - NOT IN CONTRACT
- 6 EXISTING PLAYGROUND STRUCTURE, TO BE SAVED AND REPOSITIONED AS SHOWN
- 7 LANDSCAPE BOULDER, LARGE, TYP.
- 8 LANDSCAPE BOULDER MEDIUM, TYP.
- 9 LOG BENCH, TYP.
- 10 MOVEABLE BENCHES, TYP.
- 11 MOVEABLE ROUND SEAT, TYP.
- 12 SHADE STRUCTURE
- 13 EDIBLE GARDEN PLANTER, TYP.
- 14 TRICE TRACK, EXISTING TO REMAIN
- 15 TRICE TRACK, EXISTING TO BE REPAIRED
- 16 MICROFOREST
- 17 PERMEABLE PAVEMENT - FUTURE OPPORTUNITY - NOT IN CONTRACT

| LANDSCAPE LEGEND                              |       |  |          |                             |          |
|---|-------|--|----------|-----------------------------|----------|
| TREES   | QTY   | GROUND COVER   | QTY      | LANDSCAPE FEATURES          | QTY      |
| PROPOSED SMALL (W/ 10' CANOPY) DECIDUOUS TREE | 13 EA | NATIVE HABITAT GARDEN WITH LOW WATER, USE PLANTS AND MULCH | 3,300 SF | LARGE BOULDER               | 11 EA    |
| PROPOSED LARGE (W/ 20' CANOPY) DECIDUOUS TREE | 17 EA | EDIBLE GARDEN PLANTING                                     | 357 SF   | SMALL BOULDER               | 23 EA    |
| PROPOSED LARGE (W/ 30' CANOPY) CONIFER        | 7 EA  | MULCH AREA   | 2,000 SF | REDWOOD EDGING              | 1,800 LF |
| EXISTING TREES TO REMAIN                      | 37 EA | DECOMPOSED GRANITE AREA                                    | 4,200 SF | WOOD-PLANKED RAISED PLANTER | 264 LF   |
| SLIP TREES                                    | 38 EA | MICROFOREST PLANTING                                       | 1,400 SF | 8 FT LOG BENCH              | 3 EA     |
|   |       | NATIVE AROMATIC PLANTING                                   | 342 SF   | 8 FT LOG BENCH              | 17 EA    |
|   |       | CONCRETE LANDING   | 340 SF   | MOVEABLE ROUND SEAT         | 15 EA    |
|   |       |  |          | MOVEABLE BENCH              | 28 EA    |

PROJECT AREA

TOTAL IMPERMEABLE AREA = 12,000 SF  
 TOTAL PERMEABLE AREAS = 10,875 SF









**Abstract**

**FILED**

Dec 06 2024

Deann C. Logan, Registrar-Recorder/County Clerk

Electronically signed by TINA TRAN

Figure 5 – Miramonte ES Site Plan

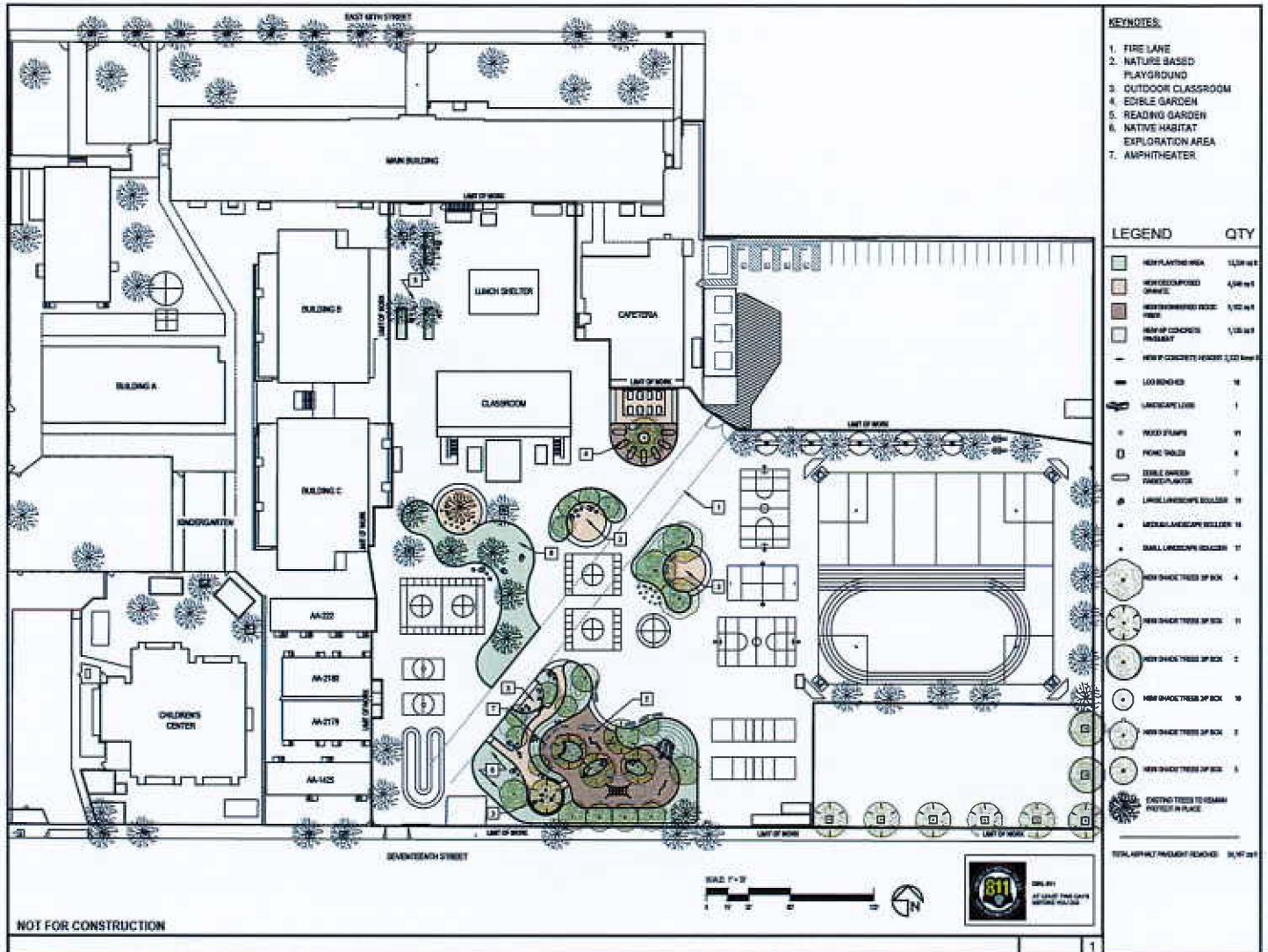


Figure 6 – Primary Academy Site Plan

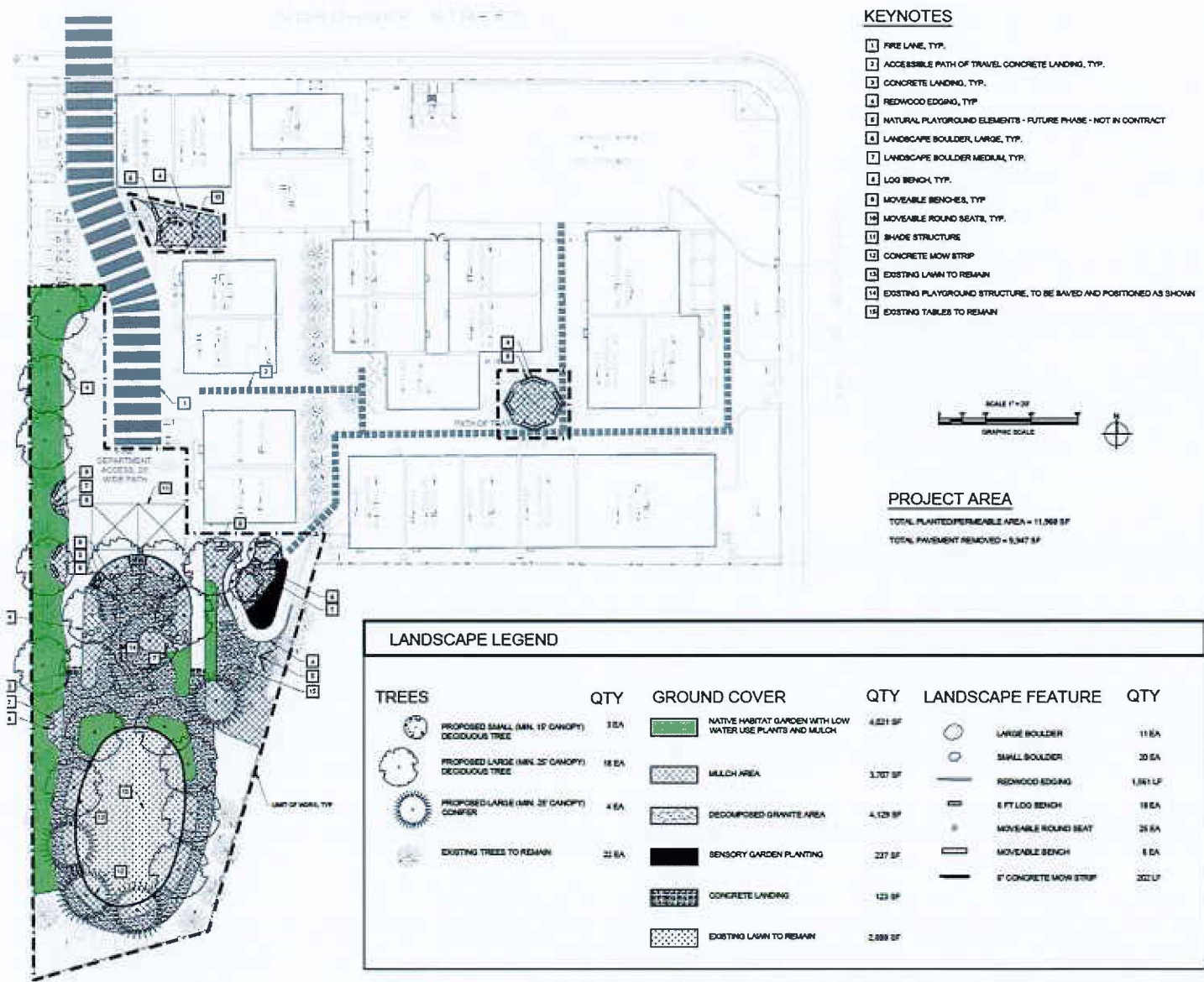


Figure 7 – Rosa Parks LC Site Plan

KEYNOTES

- 1 PINE LAKE, TYP.
- 2 ACCESSIBLE PATH OF TRAVEL
- 3 CONCRETE LANDING, TYP.
- 4 CONCRETE MOW STRIP
- 5 REDWOOD EDGING, TYP.
- 6 NATURAL PLAYGROUND ELEMENTS - FUTURE OPPORTUNITY - NOT IN CONTRACT
- 7 LANDSCAPE BOULDER, LARGE, TYP.
- 8 LANDSCAPE BOULDER, MEDIUM, TYP.
- 9 LOG BENCH, TYP.
- 10 MOVEABLE BENCHES, TYP.
- 11 MOVEABLE ROUND SEATS
- 12 TEMPORARY SHADE STRUCTURE
- 13 RAIN GARDEN RETROFIT - FUTURE OPPORTUNITY - NOT IN CONTRACT
- 14 EXISTING LAWN TO REMAIN

| LANDSCAPE LEGEND  |   |          |   |   |          |
|---|---|----------|---|---|----------|
| TREES   |   | QTY      | GROUND COVER  |   | QTY      |
|    | PROPOSED SMALL (MIN. 12' CANOPY) DECIDUOUS TREE | 3 EA     |    | NATIVE HABITAT GARDEN WITH LOW WATER USE PLANTS | 4,825 SF |
|    | PROPOSED LARGE (MIN. 25' CANOPY) DECIDUOUS TREE | 34 EA    |    | MULCH AREA                                      | 6,707 SF |
|    | PROPOSED LARGE (MIN. 25' CANOPY) CONIFER        | 8 EA     |    | DECOMPOSED GRANITE AREA                         | 4,816 SF |
|    | EXISTING TREES TO REMAIN                        | 25 EA    |    | CONCRETE LANDING                                | 246 SF   |
| LANDSCAPE FEATURES  |   | QTY      |   |   | QTY      |
|  | LARGE BOULDER                                   | 11 EA    |  | SMALL BOULDER                                   | 23 EA    |
|  | REDWOOD EDGING                                  | 3,206 LF |  | 6 INCH CONCRETE MOW STRIP                       | 360 LF   |
|  | 8 FT LOG BENCH                                  | 1 EA     |  | 8 FT LOG BENCH                                  | 17 EA    |
|  | MOVEABLE ROUND SEAT                             | 16 EA    |  | MOVEABLE BENCH                                  | 32 EA    |

PROJECT AREA

PLANTED/PERMISSIBLE AREA = 11,710 SF  
PAVEMENT TO BE REMOVED = 4,235 SF

