

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



Dean C. Logan, Registrar – Recorder/County Clerk
Electronically signed by LILIA MURGUIA

THIS NOTICE WAS POSTED

ON February 18 2025

UNTIL March 20 2025

REGISTRAR – RECORDER/COUNTY CLERK

To:
**County Clerk and Registrar-Recorder
County of Los Angeles
12400 Imperial Highway
Norwalk, CA 90650**

From:
**LA UNIFIED OEHS
333 S. Beaudry Avenue
21st Floor
Los Angeles, CA 90017**

Project Title:

Girls Academic Learning Academy Campus Reconfiguration and Upgrade Project

Project Location – Specific:

The Girls Academic Learning Academy Campus Reconfiguration and Upgrade Project (Project) will be located on the approximately 5.2-acre Girls Academic Learning Academy campus (GALA or Campus), located at 2328 Saint James Place in the City of Los Angeles. It is bound by West 23rd Avenue and Mount Saint Mary's University to the north, Mount Saint Mary's University to the east, Saint James Park West to the south, and residential uses and Saint James Park to the west. The Project will occur across the Campus. The Campus is located in an urbanized community primarily consisting of commercial uses, multi-family, and single-family residences.

Project Location – City:

Los Angeles

Project Location – County:

Los Angeles

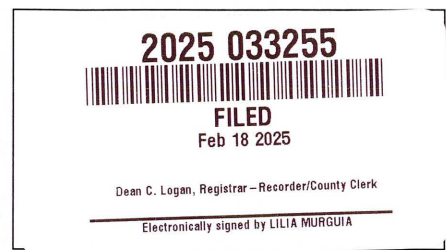
Description of Nature, Purpose, and Beneficiaries of Project:

The proposed Project will provide upgrades and alterations to facilities at the Girls Academic Leadership Academy (GALA, formerly known as Frank Lanterman High School). The Project includes the demolition and removal of three (3) existing relocatable classroom buildings and the installation of nine (9) classrooms, support spaces, and restrooms in relocatable buildings. The Project also includes minor interior improvements in existing classrooms. Associated landscape, hardscape, parking adjustments, security improvements, and infrastructure upgrades including, but not limited to, sanitary sewer, water, storm water, and electrical utilities (Figure 1). The Los Angeles Unified School District Board of Education approved the Project's budget of \$33,047,367 on September 12, 2023.

The Project will be implemented per all applicable State, federal, and local regulations, as well as all District Standards and Specifications; such as those provided in the updated Standard Conditions of Approval for District Construction,

333 South Beaudry Avenue, 21st Floor, Los Angeles, CA 90017 • Telephone (213) 241-3199 • Fax (213) 241-6816

*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.*



Upgrade, and Improvements Projects (SCs) as adopted by the Board of Education in December 2023.¹ LAUSD's SCs, 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 GALA students, faculty, staff, families, school supporters, and the community at large who may request access to the facilities and grounds of the Campus 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 15302 – Replacement or Reconstruction*
 - *CEQA Guidelines Section 15303 – New Construction or Conversion of Small Structures*
 - *CEQA Guidelines Section 153014 – Minor Additions to Schools*
- 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 includes the demolition and removal of three (3) existing relocatable classroom buildings and the installation of nine (9) classrooms, support spaces, and restrooms in relocatable buildings. The Project also includes minor interior improvements in existing classrooms. Associated landscape, hardscape, parking adjustments, security improvements, and infrastructure upgrades including, but not limited to, sanitary sewer, water, storm water, and electrical utilities will also be included. The Project would constitute operation, repair, maintenance, and minor alteration of existing public structures involving no expansion of the facilities' use. Therefore, the Project constitutes minor alterations to an existing school site 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.

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

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



This Project includes the installation of relocatable buildings, and associated landscape, hardscape, parking adjustments, security improvements, and infrastructure upgrades. The Project will not result in an increase or alteration of the current use, function, or capacity of the existing Campus. Therefore, the Project meets 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.

This Project includes the installation of nine classrooms, support spaces, and restrooms in relocatable buildings and associated landscape, hardscape, parking adjustments, security improvements, and infrastructure upgrades on the Campus. These improvements constitute operation, repair, maintenance and minor alteration of an existing campus involving no expansion in enrollment or of the facilities' use. Therefore, the Project satisfies the requirements of CEQA Guidelines Section 15303.

Section 15314 – Minor Additions to Schools

Class 14 consists of minor additions to existing schools within existing school grounds where the addition does not increase original student capacity by more than 25% or ten classrooms, whichever is less. The addition of portable classrooms is included in this exemption.

The Project entails the installation of nine classrooms, support spaces, and restrooms in relocatable buildings and associated landscape, hardscape, parking adjustments, security improvements, and infrastructure upgrades on an existing campus. The Project will neither increase the original student capacity by more than 25% or ten classrooms. Therefore, the Project satisfies the requirements of CEQA Guidelines Section 15314.

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 site is a fully developed campus within urbanized communities.³ The Project site is not designated as a biologically sensitive site or location and does not contain sensitive resources or habitat that will be impacted by the Project. The Project will be contained exclusively within the boundaries of the Campus. The nearest Significant Ecological Area is Griffith Park located approximately 6 miles north of GALA.^{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 Campus is an active school site and there will likely be ongoing maintenance activities and minor projects on the Campus to keep the schools operational. As the Project will not result in any lasting adverse impacts once

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

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

⁵ Los Angeles County Department of Regional Planning, http://gis.planning.lacounty.gov/GIS-NET3_Public/Viewer.html, accessed July 2024.



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, 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 of Approval (SC) SC-BIO-3 of the Subsequent Program Environmental Impact Report (SPEIR).^{6,7}

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 District Rule 1466, and other applicable environmental agency rules and requirements.⁸ Furthermore, as set forth in SC-CUL-6, SC-CUL-7, SC-CUL-9, 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.⁹ Lastly, any construction and demolition waste shall be recycled to the maximum extent feasible per SC-USS-1 of the Program EIR.¹⁰ Therefore, the Project will not have a significant effect on the environment due to unusual circumstances.

Additionally, a Pipeline Safety Hazard Assessment (PSHA) was completed for this Campus.¹¹ The results of the quantitative risk analysis indicate that the calculated risk for the 8-inch crude oil gathering pipeline located on-site and beneath St. James Place is 8.1×10^{-7} , which is below the LAUSD significance criterions of 1.0×10^{-6} . Therefore, the pipeline would not pose a risk to students or staff at the proposed school site and no mitigation measures are required.

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, "Tree Trimming and Removal Procedure", <http://www.lausd.org/ceqa>.

⁸ LAUSD OEHS, "Section 01 4524 Environmental Import/Export Materials Testing", http://www.laschools.org/documents/file?file_id=219798234&show_all_versions_p=t

⁹ LAUSD OEHS, "School Upgrade Program Final Subsequent Environmental Impact Report," <http://www.lausd.org/ceqa>. Adopted by the Board of Education on December 12, 2023.

¹⁰ *Ibid.*

¹¹ LAUSD OEHS. 2024. "Pipeline Safety Hazard Assessment for Girls Academic Leadership Academy"



The closest designated state scenic highway to the Project site is State Route 2 (SR 2), which is located approximately 14.4 miles northeast of GALA.¹² The Project will not be visible from SR 2. 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 is not located on a site included on any list compiled pursuant to Section 65962.5 of the Government Code.¹³ 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 historical resource.*

The City of Los Angeles included the Campus within the University Park Historic Preservation Overlay Zone (HPOZ), which was adopted by City Council in 2000. The development of University Park as a residential area was spurred by the founding of the nearby University of Southern California in 1880 and bolstered by the extension of the streetcar routes from downtown Los Angeles in 1891. With residences built between 1885 and the 1920s, the HPOZ includes fine examples of the 19th century Queen Anne style as well as later Craftsman, Spanish Colonial Revival, and American Colonial Revival styles. University Park contains one of the highest concentrations of City Historic-Cultural Monuments of any HPOZ in Los Angeles.¹⁴

Although LA Unified school properties, including the Campus, are exempt from local zoning requirements, the proposed Project will conform with the Secretary of the Interior's Standards for the Treatment of Historic Properties.¹⁵ In accordance with CEQA Guidelines Section 15064.5(b)(3), a project that conforms to the *Secretary of the Interior's Standards for the Treatment of Historic Properties (Secretary's Standards)* is generally considered to be a project that will not cause a significant adverse impact. (14 CCR Section 15126.4(b)(1)). If a project meets the *Secretary's Standards*, the project can, in most cases, be considered categorically exempt from CEQA (14 CCR Section 15331) and qualify for a Notice of Exemption.

Secretary's Standards conformance review was completed by OEHS's Historic Preservation Specialist for GALA to ensure compliance with applicable guidelines (the *Secretary's Standards* and *Los Angeles Unified School District Design Guidelines and Treatment Approaches for Historic Schools (LAUSD Design Guidelines)*). The *Secretary's Standards* conformance reviews found that the Project conforms to the *Secretary's Standards* at GALA¹⁶. As the work at the schools shall conform with the *Secretary's Standards* and the *LAUSD Design Guidelines*, OEHS' Historical Preservation Specialist 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.

¹² Los Angeles County Department of Regional Planning, http://gis.planning.lacounty.gov/GIS-NET3_Public/Viewer.html, accessed July 2024.

¹³ Department of Toxic Substances Control, "Hazardous Waste And Substances Site List (Cortese)" https://www.envirosor.dtsc.ca.gov/public/search?cmd=search&reporttype=CORTESE&site_type=CSITES,FUDS&status=ACT,BKLG,COM&reporttitle=HAZARDOUS+WASTE+AND+SUBSTANCES+SITE+LIST+%28CORTESE%29, accessed July 2024.

¹⁴ Los Angeles City Planning, "University Park Historic Preservation Overlay Zone." <https://planning.lacity.gov/preservation-design/overlays/university-park>. Accessed July 2024.

¹⁵ On February 19, 2019, pursuant to Government Code Section 53094, the LA Unified Board of Education adopted a Resolution to exempt all LAUSD school sites from local land use regulations.

Regular Meeting Stamped Order of Business, Board of Education Report No. 256-18/19. Los Angeles: LA Unified Board of Education, February 19, 2019.

¹⁶ LAUSD OEHS. 2025. "GALA SOIS Compliance Review"



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.

Prepared By:

Phone and Email:

Christy Wong
CEQA Project Manager/Contract Professional

(213) 241-3394
cp-christy.wong@LAUSD.net

Signed by:

Date:

2/5/25

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



Figure 1. Site Plan

