Los Angeles Unified School District

Office of Environmental Health and Safety

ANDRÉS E. CHAIT
Superintendent of Schools

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Director, Environmental Health and Safety

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Deputy Director, Environmental Health and Safety

NOTICE OF EXEMPTION

THIS NOTICE WAS POSTED

ON November 06 2026

UNTIL December 07 2026

REGISTRAR – RECORDER/COUNTY CLERK

2026 235698

FILED

Nov 06 2026

Dean C. Logan, Registrar – Recorder/County Clerk

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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:
Limerick Avenue Elementary School Classroom Replacement Project

Project Location – Specific:
The Limerick Avenue Elementary School Classroom Replacement Project (Project) will be located on the approximately 7.5-acre Limerick Avenue Elementary School campus (Limerick ES or Campus). The Campus is located at 8530 Limerick Avenue in the Winnetka Neighborhood in the City of Los Angeles. It is bound by Michale Street to the north, Sunny Brae Avenue to the east, Chase Street to the south, and Limerick Avenue to the west. The Campus is located in an urbanized community primarily consisting of commercial uses, multi-family, and single-family residences. The Project will occur across Campus.

Project Location – City:
Los Angeles

Project Location – County:
Los Angeles

Description of Nature, Purpose, and Beneficiaries of Project:
Relocatable classroom replacement projects will reduce LA Unified's reliance on relocatable buildings, restore play space, increase green schoolyards, eliminate health and safety concerns, and/or reduce Maintenance and Operations costs. Limerick ES was prioritized due to the site wide reliance on relocatable classroom buildings that are not certified by Division of State Architect (DSA).

The Project will remove aging relocatable buildings at Limerick ES, which includes 23 relocatable buildings, 19 of which are not certified by DSA, containing 42 classrooms and support spaces. To replace them, the Project will construct a new two-story classroom building consisting of 29 classrooms and support and administrative spaces. Site improvements include new parking, utility upgrades, new playground areas, new track with turf, outdoor learning environments, landscaping, hardscaping, fencing and gates, security enhancements, and accessibility upgrades; exterior painting of existing buildings and structures; and interim facilities necessary to support school programs during construction (Figure

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1). The Los Angeles Unified School District Board of Education approved the Project's budget of $122,584,000 on June 4, 2024.

The Project also entails the implementation of a cleanup plan for arsenic impacted soil, which includes excavation and disposal of impacted soil located in a portion of the construction area of the Project. The soil cleanup portion of the Classroom Replacement Project is estimated to cost approximately $654,630.

Soil sampling was performed as part of the Preliminary Environmental Assessment Equivalent (PEA-E) and Soil Management Plan (SMP) to address compliance with South Coast Air Quality Management District (SCAQMD). Arsenic was reported in soil samples above the Department of Toxic Substance Control (DTSC) upper bound estimate (95th percentile) for background concentration for southern California of 12 milligrams per kilograms (mg/kg). A complete copy of the report for this investigation is included in the PEA-E and SMP.[1] This SMP was prepared to describe the procedure for removing the soil with elevated arsenic concentrations to below the DTSC background concentration in the paved areas and unpaved areas of the school.

Based on site characterization data, the SMP includes the following elements:

- Excavation and off-site disposal of soils with arsenic concentrations ≥12 milligrams per kilogram from eight Areas of Concern (AOCs).
- Excavation of soil to a depth of 1-2 feet below ground surface, depending on the AOC.
- Additional excavation of impacted soil from tree wells to a depth of approximately one foot or a feasible depth that does not compromise the health of the trees.
- Verification sampling of excavation areas to confirm arsenic-impacted soil has been removed.
- After confirmation sample results confirm the remedial goals, excavation areas will be graded or backfilled with clean fill material.

The SMP identifies best management practices designed to limit potential short-term risks (e.g., the exposure of students, staff, and onsite workers to chemical of concerns during soil excavation activities) through the proper use of institutional controls, such as engineering controls, security measures, personal protective equipment (PPE), and adherence to established health and safety procedures, including the application of water spray to suppress fugitive dust emissions during the excavation, the proper handling, transportation and disposal of impacted soil, and enforcing speed limits at the Project site. All soil removal activities will follow generally acceptable practices, institutional controls, and State, federal, and local agency guidelines, including, but not limited to, those of the: Environmental Protection Agency (EPA), SCAQMD, Occupational Safety and Health Administration (OSHA)/National Institute of Occupational Safety and Health (NIOSH), and Regional Water Quality Control Board. Soil removal will occur when students and staff are off campus.

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, Upgrade, and Improvements Projects (SCs) as adopted by the Board of Education in December 2023.[2] 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 Limerick ES students, faculty, staff, families, school supporters, and the

[1] LAUSD OEHS. February 2026. "Preliminary Environmental Assessment-Equivalent Report and Soil Management Plan, Limerick Elementary School." Los Angeles, California.
[2] 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.

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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 15268[3]]:
- ☐ 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 15314 – Minor Additions to Schools*
  - *CEQA Guidelines Section 15330 - Minor Actions to Prevent, Minimize, Stabilize, Mitigate or Eliminate the Release or Threat of Release of Hazardous Waste or Hazardous Substances*
- ☐ 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 aging relocatable buildings at Limerick ES, which includes a total of 23 relocatable buildings containing 42 classrooms and support spaces. To replace them, the Project will construct a new two-story classroom building consisting of 29 classrooms and support and administrative spaces. Site improvements include new parking, utility upgrades, new playground areas, new track with turf, outdoor learning environments, landscaping, hardscaping, fencing and gates, security enhancements, and accessibility upgrades; exterior painting of existing buildings and structures; and interim facilities necessary to support school programs during construction. 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.

As previously noted, the Project will remove aging relocatable buildings at Limerick ES, which includes a total of 23 relocatable buildings containing 42 classrooms and support spaces. To replace them, the Project will construct a new two-

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

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story classroom building consisting of 29 classrooms and support and administrative spaces. Site improvements include new parking, utility upgrades, new playground areas, new track with turf, outdoor learning environments, landscaping, hardscaping, fencing and gates, security enhancements, and accessibility upgrades; exterior painting of existing buildings and structures; and interim facilities necessary to support school programs during construction. 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.

The Project consists of site improvements including new parking, utility upgrades, new playground areas, new track with turf, outdoor learning environments, landscaping, hardscaping, fencing and gates, security enhancements, and accessibility upgrades; exterior painting of existing buildings and structures; and interim facilities necessary to support school programs during construction. 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 removal of 23 existing relocatable buildings containing 42 classrooms and the construction of a new two-story classroom building consisting of 29 classrooms on an existing campus. The Project will not increase the original student capacity by more than 25% or ten classrooms. Therefore, the Project satisfies the requirements of CEQA Guidelines Section 15314.

Section 15330 - Minor Actions to Prevent, Minimize, Stabilize, Mitigate or Eliminate the Release or Threat of Release of Hazardous Waste or Hazardous Substances

Class 30 consists of any minor cleanup actions taken to prevent, minimize, stabilize, mitigate, or eliminate the release or threat of release of a hazardous waste or substance which are small or medium removal actions costing $1 million or less.

The Project entails the implementation of a SMP for arsenic impacted soil; excavation of impacted soil; and disposal of impacted soil.

Based on site characterization data, the SMP includes the following elements:

- Excavation and off-site disposal of soils with arsenic concentrations ≥12 milligrams per kilogram from eight AOCs.
- Excavation of soil to a depth of 1-2 feet below ground surface, depending on the AOC.
- Additional excavation of impacted soil from tree wells to a depth of approximately one foot or a feasible depth that does not compromise the health of the trees.
- Verification sampling of excavation areas to confirm arsenic impacted soil has been removed.
- After confirmation sample results confirm the remedial goals, excavation areas will be graded or backfilled with clean fill material.

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The SMP identifies best management practices designed to limit potential short-term risks (e.g., the exposure of students, staff, and onsite workers to AOCs during soil excavation activities) through the proper use of institutional controls, such as engineering controls, security measures, personal protective equipment (PPE), and adherence to established health and safety procedures, including the application of water spray to suppress fugitive dust emissions during the excavation, the proper handling, transportation and disposal of impacted soil, and enforcing speed limits at the Project site. The Soil Cleanup portion of the Classroom Replacement Project is estimated to cost approximately $654,630 and will therefore qualify for the Class 30 exemption.

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 will occur on an existing campus that is located within an urban setting.[4] The surrounding uses are residential and commercial. The Campus has not been designated as a biologically sensitive site or location and does not contain sensitive resources or habitat that will be impacted by the Project. The nearest significant ecological area (SEA) is Santa Susana Mountains/Simi Hills which is located approximately 1.8 miles west of the Campus.[5] The nearest critical habitat is designated for the Braunton's milk-vetch and is located approximately 4 miles west of the site.[6] 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 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 anticipated as part of the proposed scope of work. District procedure requires that all tree trimming and removals conducted on District property adhere to the procedures outlined in the District's Tree Trimming and Removal Procedure. District policy requires consultation with an arborist to determine if the trees are a protected native species. There are three coast live oak trees (*Quercus agrifolia*) located within the development area.[7] The removal of protected native trees or shrubs on District property requires a 4:1 replacement ratio. Additionally, written approval from the school principal will be required before any trees can be removed.[8] If tree removal is scheduled to occur between February 1 and August 31, a nesting bird survey would be performed prior to removal

[4] City of Los Angeles. ZIMAS. Available at: http://zimas.lacity.org. Accessed September 2026.
[5] Los Angeles County Department of Regional Planning, https://arcgis.gis.lacounty.gov/arcgis/rest/services/DRP/Open_Data/MapServer/12, accessed September 2026.
[6] United States Fish and Wildlife Service Critical Habitat Portal, https://ecos.fws.gov/ecp/report/table/critical-habitat.html accessed September 2026.
[7] LAUSD, 2024, "Limerick Elementary School– Site Analysis of Select Trees."
[8] LAUSD OEHS, "Tree Trimming and Removal Procedure", https://www.lausd.org/ceqa.

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activities, per Standard Condition of Approval (SC) SC-BIO-3 of the Subsequent Program Environmental Impact Report (SPEIR).[9,10]

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 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. A SMP was prepared in support of the Project.[11] The SMP concluded that soil with elevated arsenic concentrations should be removed during construction. Additionally, SCAQMD Rule 1466 and SCAQMD Fugitive Dust Rule 403 must be followed during excavation. Air monitoring of Particulate Matter (PM) 10 emissions during movement of impacted soils will occur. 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 and other applicable environmental agency rules and requirements.[12] 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.[13] Lastly, any construction and demolition waste shall be recycled to the maximum extent feasible per SC-USS-1 of the Program EIR.[14] 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 State Route 27 (SR 27, Topanga Canyon Boulevard), which is located approximately 10 miles south of Limerick ES.[15] The Project will not be visible from SR 27. Therefore, the Project will not result in damage to scenic resources or similar resources within a highway that is officially designated as a 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.[16] 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.*

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[9] LAUSD OEHS, "Standard Conditions of Approval for District Construction, Upgrade, and Improvements Projects," Adopted by the Board of Education on December 12, 2023

[10] LAUSD OEHS, "Tree Trimming and Removal Procedure", https://www.lausd.org/ceqa.

[11] LAUSD OEHS. February 2026. "Preliminary Environmental Assessment-Equivalent Report and Soil Management Plan, Limerick Elementary School." Los Angeles, California.

[12] LAUSD OEHS, "Section 01 4524 Environmental Import/Export Materials Testing", http://www.laschools.org/documents/file?fileid=219798234&showallversionsp=t

[13] 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.

[14] *Ibid.*

[15] Los Angeles County Department of Regional Planning, https://arcgis.gis.lacounty.gov/arcgis/rest/services/DRP/Open_Data/MapServer/12. Accessed September 2026.

[16] Department of Toxic Substances Control, "Hazardous Waste And Substances Site List (Cortese)" https://dtsc.ca.gov/dtscs-cortese-list/, accessed September 2026.

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Built in 1953, Limerick ES is over 45 years old meeting LAUSD's threshold as a potential historic resource and requiring evaluation for historic eligibility. LAUSD's Historic Preservation Specialist has evaluated Limerick ES and determined that it is not eligible for federal, State, or local listing under any of the applicable criteria and is therefore, not considered a historical resource pursuant to CEQA.[17] Therefore, the Project will not cause a substantial adverse change in the significance of a historic resource.

Prepared By:

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Signed by:

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

Date:

10/21/26

[17] LAUSD OEHS. 2026. LAUSD Historic Resources Database.

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Figure 1. Project Site Plan

