Los Angeles Unified School District

Office of Environmental Health and Safety

ANDRÉS E. CHAIT
Superintendent of Schools

CARLOS A. TORRES
Director, Environmental Health and Safety

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Deputy Director, Environmental Health and Safety

NOTICE OF EXEMPTION

THIS NOTICE WAS POSTED
ON November 24 2026
UNTIL December 24 2026
REGISTRAR – RECORDER/COUNTY CLERK

2026 248021
FILED
Nov 24 2026
Dean C. Logan, Registrar – Recorder/County Clerk
Electronically signed by CYNTHIA ESTRADA

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:
Palms Elementary School Playground and Campus Exterior Upgrades Project

Project Location – Specific:
The Palms Elementary School Playground and Campus Exterior Upgrades Project (Project) will be located on the approximately 4-acre Palms Elementary School campus (Palms ES or Campus). The Campus is located at 3520 Motor Avenue in the Palms neighborhood in the City of Los Angeles. It is bound by Palms Boulevard to the north, Vinton Avenue to the east, Tabor Street to the south, and Motor Avenue to the west. The Campus is located in an urbanized community primarily consisting of commercial and residential uses. The Project will occur across the Campus.

Project Location – City:
Los Angeles

Project Location – County:
Los Angeles

Description of Nature, Purpose, and Beneficiaries of Project:
The Project will replace approximately 53,000 square feet of existing paving in the main playground, kindergarten playground, and lunch shelter area that has exceeded its useful life with new paving. The scope of work also includes solar reflective coating of the playgrounds; replacement of playground equipment; installation of an outdoor learning environment; greening and landscaping throughout the Campus; installation of privacy fencing; and exterior painting of buildings and structures where needed. The Project will also provide infrastructure upgrades including sanitary sewer and storm drainage utilities upgrades and accessibility upgrades (Figure 1). The Los Angeles Unified School District Board of Education approved the Project's budget of $9,131,296 on January 14, 2025.

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,

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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 the Project include Palms ES students, faculty, staff, families, school supporters, and the community at large who may request access to the playground 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[2]]:
- ☐ 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 will replace approximately 53,000 square feet of existing paving in the main playground, kindergarten playground, and lunch shelter area that has exceeded its useful life with new paving. The scope of work also includes solar reflective coating of the playgrounds; replacement of playground equipment; installation of an outdoor learning environment; greening and landscaping throughout the Campus; installation of privacy fencing; and exterior painting of buildings and structures where needed. The Project will also provide infrastructure upgrades including sanitary sewer and storm drainage utilities upgrades and accessibility upgrades. The Project would constitute operation, repair, maintenance, and minor alteration of existing public facilities involving no expansion of the facilities' use. Therefore, the Project satisfies 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.

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As previously noted, the Project will replace approximately 53,000 square feet of existing paving in the main playground, kindergarten playground, and lunch shelter area that has exceeded its useful life with new paving. The scope of work also includes solar reflective coating of the playgrounds; replacement of playground equipment; installation of an outdoor learning environment; greening and landscaping throughout the Campus; installation of privacy fencing; and exterior painting of buildings and structures where needed. The Project will also provide infrastructure upgrades including sanitary sewer and storm drainage utilities upgrades and accessibility 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 fulfills 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 removal of healthy, mature, scenic trees except for forestry or agricultural purposes.

The Project will repave existing asphalt as well as provide solar reflective coating the playgrounds, greening, landscaping, and infrastructure upgrades throughout the campus. The Project will not remove healthy, mature, scenic trees.[3] Therefore, the Project fulfills 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 site is a fully developed Campus within an urbanized community.[4] 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 the Ballona Wetlands located approximately 3.3 miles southwest of Palms ES and the nearest critical habitat is for the Western snowy plover located approximately 5.6 miles southwest of the Campus.[5,6] 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 policy requires consultation with an arborist

[3] A CEQA scenic tree is highly visible, prominent and possesses unique or distinctive aesthetic qualities due to its size, structure, unusual specimen, etc.
[4] City of Los Angeles Planning Department, *Zoning and Information Management System*, http://zimas.lacity.org/, accessed October 2026.
[5] United States Fish and Wildlife Service Critical Habitat Portal, https://ecos.fws.gov/ecp/report/table/critical-habitat.html accessed October 2026.
[6] Los Angeles County Department of Regional Planning, https://arcgis.gis.lacounty.gov/arcgis/rest/services/DRP/Open_Data/MapServer/12, accessed October 2026.

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to determine if the trees are a protected native species. According to the Site Analysis conducted by a certified arborist, there are no protected native trees in the development zone.[7] 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 activities, per Standard Condition of Approval (SC) SC-BIO-3 of the Subsequent Program Environmental Impact Report (SPEIR).[9,10]

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. 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 are 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.[11] 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.[12] Lastly, any construction and demolition waste shall be recycled to the maximum extent feasible per SC-USS-1 of the SPEIR.[13] 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 northwest of Palms ES.[14] The Project will not be visible from SR 27. 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.[15] 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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[7] LAUSD, 2026, "Palms Elementary School– Site Analysis of Select Trees."
[8] LAUSD OEHS, "Tree Trimming and Removal Procedure", https://www.lausd.org/ceqa.
[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, "Section 01 4524 Environmental Import/Export Materials Testing", http://www.laschools.org/documents/file?file_id=219798234&show_all_versions_p=t
[12] LAUSD OEHS, "School Upgrade Program Final Subsequent Environmental Impact Report," https://www.lausd.org/ceqa. Adopted by the Board of Education on December 12, 2023
[13] *Ibid.*
[14] Los Angeles County Department of Regional Planning, https://arcgis.gis.lacounty.gov/arcgis/rest/services/DRP/Open_Data/MapServer/12, accessed October 2026.
[15] Department of Toxic Substance Control, https://dtsc.ca.gov/dtscs-cortese-list/, accessed October 2026.

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Palms ES is over 45 years old, meeting LAUSD's threshold for review as a potential historic resource and requiring evaluation for historic eligibility. LAUSD's Historic Preservation Specialist has determined that Palms ES 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.[16] Therefore, the Project will not cause a substantial adverse change in the significance of a historical resource.

Prepared By:

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Signed by:

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

Date:

11/3/26

[16] LAUSD OEHS, "LAUSD Historic Resources Inventory," accessed October 2026.

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Figure 1. Project Site Plan

