



**LOS ANGELES UNIFIED SCHOOL DISTRICT  
REFERENCE GUIDE**

**TITLE:** Procedures for Environmental Review of Proposed Projects

**NUMBER:** REF-5314.1

**ISSUER:** John Sterritt, Director  
Office of Environmental Health and Safety

Enrique G. Boull't, Chief Operating Officer  
Office of the Chief Operating Officer

**ROUTING**  
All Schools and Offices  
Local District  
Superintendents  
Local District Operations  
Coordinators  
Local District Facilities  
Directors

**DATE:** March 7, 2012

**PURPOSE:** On April 22, 2003, the Board of Education adopted the revised *Los Angeles Unified School District Procedures for Implementing the California Environmental Quality Act*. This Reference Guide provides procedural guidelines to ensure proposed projects are evaluated and approved in accordance with State law.

**MAJOR CHANGES:** This Reference Guide replaces REF-5314.0, *Procedures for Environmental Review of Proposed Projects*, November 15, 2010. This revision includes new instructions that require adherence to environmental review guidelines for proposed co-location or land lease agreements for charter school facilities and proposed joint –use and innovation funds programs.

**INSTRUCTIONS:** As directed by the Board of Education, the Office of Environmental Health and Safety (OEHS) is required to review the following types of projects regardless of funding source:

- Proposed new school site;
- Expansion, major repair, or modernization of existing school facilities;
- Proposed placement/removal of bungalows or other temporary structures at existing school facilities;
- Change in use or occupancy of existing facilities;
- Proposed co-location or land lease agreements for charter school facilities;
- Proposed joint-use and innovation funds programs; and
- Proposed lease or use of non-District property for District purposes.

OEHS review is not required for minor activities involving routine maintenance, repair, and activities that do not have the potential to impact public health, safety, or the environment.

I. Application for OEHS Review

It is the responsibility of the project proponent (i.e., administrative executive,



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director, manager, or designee) to provide written notification to OEHS of any project that may result in direct or reasonably foreseeable indirect changes to the environment before taking any action to implement the proposed project. All District activities including projects initiated by community groups, Local Districts, schools, and District departments such as Real Estate/Asset Management, Project Execution, Maintenance & Operations, Innovation and Charter Schools Division, and Division of Adult and Continuing Education must undergo OEHS evaluation.

### II. OEHS Review

The degree of review is based upon the location and scope of the proposed project. This may include but is not limited to evaluation under the auspices of the California Environmental Quality Act (CEQA), certification that the project will not create a new significant safety hazard or exacerbate an existing safety hazard to students (California Code of Regulations (CCR), Title 5, Section 14010), and the preparation of related technical studies such as a Preliminary Environmental Assessment (PEA).

### III. CEQA Applicability

To initiate the review process, the project proponent must complete and submit electronically a *Preliminary Project Referral Form* (Attachment 1) along with available site plans and architectural drawings to [environmental\\_review@lausd-oehs.org](mailto:environmental_review@lausd-oehs.org). OEHS will review these documents to determine the scope of the proposed project and extent of CEQA analysis required. This may include documentation that the project is categorically exempt from the need to prepare an environmental impact report. There are 33 classes of categorical exemptions and the following classes may apply for most school-based projects.

- Class 1: Existing Facilities
- Class 2: Replacement or Reconstruction
- Class 3: New Construction or Conversion of Small Structures
- Class 4: Minor Alterations to Land
- Class 14: Minor Additions to Schools
- Class 32: Infill Development Projects

If a CEQA exemption is applicable, a Notice of Exemption will be prepared by OEHS and, when deemed appropriate, filed with the Los Angeles County Clerk and the State Office of Planning and Research. Additional consultation with the project proponent may be required should the scope of the project indicate additional study is warranted.

The following is a list of additional studies that may be required to determine



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if the proposed project qualifies for a categorical exemption.

- Air Quality
- Hazardous Waste Site Designation
- Hazard and assessment studies identified in Section 4.0
- Historical Resources
- Light/Glare
- Noise
- Parking Demand/Traffic
- Shade/Shadow

OEHS will provide the scope of services and process the appropriate work authorizations to complete the required technical studies.

When a project does not qualify for a categorical exemption, OEHS will prepare an Initial Study to determine the appropriate level of CEQA review. The following are examples of CEQA documentation that may be utilized to characterize a project's impact on the environment.

- *Negative Declaration (ND)* – is prepared when it is determined that the proposed project will not have a significant effect on the environment.
- *Mitigated Negative Declaration (MND)* – is prepared when it is determined that the proposed project will have a significant effect on the environment but these effects can be mitigated to below a defined level of significance.
- *Environmental Impact Report (EIR)* – is prepared when it is determined that the proposed project has the potential to result in significant and unavoidable impacts.

In the case of an MND or EIR, feasible mitigation measures must be identified and incorporated as part of the project. Upon completion of the appropriate level of CEQA review, the document is circulated for public comment. Based upon the comments received, the document is finalized and submitted to the Board of Education for adoption/certification. Following adoption/certification the project can be approved. Subsequently, OEHS will file a Notice of Determination with the Los Angeles County Clerk and the State Office of Planning and Research.

#### IV. Hazard and Assessment Studies

The presence of potentially toxic or hazardous conditions on or in the vicinity of a proposed or existing District facility must be addressed to ensure the health and safety of students and staff, as well as protection of the environment. Based upon the location and scope of the proposed project, the



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following studies may be required:

- School Safety Certification (CCR Title 5, Section 14010) – This certification is required by the California Department of Education (CDE) for State-funded projects. Completion of this task requires that an evaluation be completed to document that the project will not create a new significant safety hazard or exacerbate an existing safety hazard to students.
- Site Screening – A site reconnaissance, aerial photograph review, and environmental database search is required to identify all potential sources of risk which may impact the health and safety of individuals attending a proposed elementary or secondary school. The results are compared to the *OEHS Distance Criteria for School Siting* (Attachment 2) to determine the proximity of the project site to any rail lines, pipelines, oil fields, methane zones, methane buffer zones, freeways, landfills, industrial facilities, and high voltage power lines. The findings are documented in an OEHS Site Environmental Review (SER). All sources of environmental risk identified in the SER are evaluated further and may include one or more of the following specialized studies.
  - *Air Quality Health Risk Assessment (HRA)* – to characterize identified off-site sources, calculate emissions, and assess the subsequent health risk.
  - *Pipeline Safety Hazard Assessment (PSHA)* – to characterize potential risks from a hazardous material pipeline rupture.
  - *Rail Safety Study (RSS)* – to characterize the potential risk from train activities, including derailments.
  - *Electromagnetic Field Exposure Management Plan (EMF Study)* – to assess the exposure from EMF from nearby power lines at a proposed school site and within the surrounding community.
  - *Geohazard Report* – to assess potential geologic hazards, including the risk from faulting, seismic activity, landslides, liquefaction, flooding, and inundation.
  - *Tank Safety Study* – to assess the risk associated with fuel or water storage tanks and reservoirs.
  - *Methane Assessment* – to assess the potential risk associated with oil fields, methane zones and methane buffer zones.
- Phase I Environmental Site Assessment (ESA) – The Phase I ESA documents historic site use as well as those of neighboring properties that may have impacted the site. It is generally required in instances of projects involving construction of new buildings, or where there will be



disturbance of significant volumes of soil. Based on the findings of the Phase I ESA, further investigation and intrusive sampling may be required. This assessment must be completed utilizing the most current American Society for Testing and Materials (ASTM) standard.

- Preliminary Environmental Assessment (PEA) – The PEA characterizes subsurface contaminants and estimates the potential health risk to school occupants; it is typically based on the results of a Phase I ESA. Prior to conducting fieldwork, a PEA workplan is prepared to identify the objectives for environmental sampling and define the methods by which they will be achieved. The PEA workplan is reviewed and revised in consultation with appropriate parties prior to implementation. Typically, both the workplan and the PEA report are reviewed by the Department of Toxic Substances Control (DTSC), OEHS, and/or related environmental authority in order to ensure the quality of the environmental data gathered and conclusions drawn by the investigator are adequate. In general, the PEA report recommends one of three options: 1) no further action; 2) further assessment and characterization of risk; or 3) development and implementation of remedial action. In addition, there are some sites where the extent of contamination is substantial and the cost and time required to remediate may make the project infeasible. If further assessment is recommended, a supplemental workplan is prepared to fill remaining data gaps in the assessment.
- Remedial Action and Mitigation Measures – Should significant risks from subsurface contamination be identified, a Removal Action Workplan or Remedial Action Plan is prepared and implemented with oversight by OEHS, DTSC, and/or other regulatory agency. Documentation of the implemented remedial action is included in a subsequent Remedial Action Completion Report.

These studies must be conducted in consultation with OEHS staff. If significant risks are identified, mitigation measures must be evaluated and impacts reduced to acceptable levels consistent with regulatory standards and/or applicable guidance. Please note that some sources of risk may preclude the use of the site as a school due to estimated cost, timing, or technical infeasibility of mitigation.

## V. Soil Management

Consideration must be given to the management of excavated soil associated with identified earthwork activities. Please note that excavated soils should only be reused on-site if they are to be placed beneath paved areas. If construction or earthmoving activities require import or export of soils and



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materials, OEHS must be notified to provide oversight to ensure that these activities are conducted in accordance with the requirements of District Specification 01 4524 (formally 1440) and in compliance with applicable environmental agency rules and requirements.

Furthermore, work must be stopped immediately and OEHS notified if subsurface features such as buried debris, tanks or seepage pits, stained/odoriferous soils, or items of potential cultural significance are found during construction related activities.

### VI. Facility Safety Inspection

Prior to occupancy of newly constructed schools, structural additions, and related projects which add additional classroom space, or other projects where a Division of State Architects' Form 6 is issued, a health and safety inspection is conducted following standard OEHS inspection protocols and reported in the *Essential Safety Checklist & Approval Form* (Attachment 3) in accordance with OEHS's *Occupancy Approval Criteria for Completed School Projects* (Attachment 4). It is the responsibility of the project proponent to request the inspection at least two months prior to occupancy. Once all occupancy criteria have been satisfied, OEHS will issue a completed *Essential Safety Checklist & Approval Form*. Deficiencies that do not prevent a school project from opening will be documented by OEHS in a Corrective Action Notice (CAN) that is normally issued after occupancy is approved. Corrective measures must be completed and reported to OEHS at [http://www.lausd-oehs.org/fieldoperations\\_listschools.asp](http://www.lausd-oehs.org/fieldoperations_listschools.asp).

**RELATED RESOURCES:** Board of Education Report No. 129-02/03. A copy is available on the Office of Environmental Health and Safety website at [http://www.lausd-oehs.org/docs/Misc/BoardReport\\_129\\_02-03.pdf](http://www.lausd-oehs.org/docs/Misc/BoardReport_129_02-03.pdf).

**ASSISTANCE:** For assistance or further information, please contact the Office of Environmental Health and Safety (213) 241-3199.

**LOS ANGELES UNIFIED SCHOOL DISTRICT  
Office of Environmental Health and Safety**

**PRELIMINARY PROJECT REFERRAL FORM**

Date: \_\_\_\_\_  
From (Incl. Title): \_\_\_\_\_  
Phone: ( ) \_\_\_\_-\_\_\_\_  
Email: \_\_\_\_\_  
Project Title: \_\_\_\_\_  
PIC Project No: \_\_\_\_\_  
School Name: \_\_\_\_\_  
School Address: \_\_\_\_\_

**Funding Lines:**

CEQA: Amount: \_\_\_\_\_

Fund	Area	Location	Program	Object	IFS#	Phase	Sub-Project

Site Assessment: Amount: \_\_\_\_\_

Fund	Area	Location	Program	Object	IFS#	Phase	Sub-Project

Will State Funds be Sought? \_\_\_\_\_ Funding Source: \_\_\_\_\_  
Projected Construction Start Date: \_\_\_\_\_ Construction Duration: \_\_\_\_\_

**PROJECT DESCRIPTION**

New Construction  Exterior Modernization  Interior Modernization

Describe Proposed Project (incl. all components of the project):

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Total Number of New Buildings Proposed (if applicable): \_\_\_\_\_

Number of New Portable Buildings (if applicable): \_\_\_\_\_

Name/Number of Existing Building(s) Where Work is Proposed (if applicable):

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Number, Description and Square footage of Structures or Areas to be Demolished:

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Number, Description and Square Footage of New Structures or Paved Areas:

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Number of New Classrooms: \_\_\_\_\_

Total Number and Location of Proposed Parking Spaces: \_\_\_\_\_

**ADDITIONAL INFORMATION**

Approval Required from:

DSA

OPSC

N/A

Proposed Increase in Enrollment: \_\_\_\_\_

Proposed Increase in Capacity: \_\_\_\_\_

Is trenching or soil excavation required? If so, estimated linear feet/acres. \_\_\_\_\_

Will project require importing or exporting of soils? If so, estimated volume (cubic yards). \_\_\_\_\_

Will excavated soils be used for onsite cut and fill activities, or shipped offsite? \_\_\_\_\_

Are any of school buildings/structures listed/eligible for listing on Historical Register? \_\_\_\_\_

Proposed Site Plan(s) Attached:

Existing Site Plan(s) Attached:

Other Comments or Information: \_\_\_\_\_

**SUBMIT TO:** [environmental\\_review@lausd-oehs.org](mailto:environmental_review@lausd-oehs.org)

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Office of Environmental Health and Safety

REF-5314.1  
March 5, 2012

ATTACHMENT 2

Distance Criteria for School Siting

FEATURE	DESCRIPTION	Screening Perimeter <sup>(1)</sup>	Exclusion Zone <sup>(2)</sup>	
<b>Rail Line</b>	Active rail lines, easements, and spurs.	1,500 ft	128 ft <sup>(3)</sup>	
<b>Cellular Phone Antennas</b>	Cellular phone antennas.	200 ft	Within or adjacent to site	
<b>High Voltage Power Line</b>	High voltage power lines determined to be 50 kv or higher		Above- Ground	Below- Ground
	➤ 50 - 200 kv	500 ft	100 ft	25 ft
	➤ 220 - 230 kv	500 ft	150 ft	37.5 ft
	➤ 500 - 550 kv	500 ft	350 ft	87.5 ft
<b>Freeway/Major Transportation Corridor</b>	Freeways, State highways or designated roadways with more than 100,000 automobile trips per day. Rail lines with high volumes of traffic.	1,500 ft	500 ft	
<b>Reservoirs, Water, or Fuel Storage Tanks</b>	Reservoirs or water or fuel storage tank facilities.	1,500 ft	500 ft	
<b>Hazardous Material Pipelines<sup>(4)</sup></b>	Transmission pipelines or industrial distribution pipelines, including those for conveying crude oil, natural gas, or other chemicals characterized as hazardous.	1,500 ft	50 ft	
<b>Oil Production Facilities</b>	Facilities including existing and former oil wells, oil borings or oil processing equipment	1,500 ft	50 ft	
<b>Oil Fields/Methane Zones or Methane Buffer Zones</b>	City or State mapped oil fields, methane and methane buffer zones	1,500 ft	NA <sup>(5)</sup>	
<b>Industrial Site/Superfund</b>	Facilities with a potential to emit hazardous air contaminants or otherwise present a significant risk to school occupants.	1,500 ft	500 ft	
<b>Landfill</b>	Landfills authorized for the disposal of hazardous or non-hazardous wastes.	2,000 ft	500 ft	
<b>Earthquake Faults</b>	Mapped or well-defined active earthquake faults.	1,500 ft	50 ft <sup>(3)</sup>	

<sup>1</sup> For proposed school sites, screening will be conducted within the perimeter to identify any of the features listed in Column 1.

<sup>2</sup> Exceptions can be made if supported by risk assessment and compliant with applicable law.

<sup>3</sup> Habitable school buildings and places of assembly shall be located outside the setback.

<sup>4</sup> Natural gas distribution lines used to service local neighborhoods are excluded.

<sup>5</sup> NA – Not Applicable. With appropriate mitigation measures in place, facilities can be located within methane and methane buffer zones.

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**Essential Safety Checklist & Approval Form**

The purpose of this checklist is to identify **essential safety requirements** to be met prior to occupancy of newly constructed schools, school buildings or **other school projects which add classrooms**. A comprehensive listing of federal, state and local regulations dealing with school safety maybe found in the "OEHS Safe School Inspection Guidebook", available at [www.lausd-oehs.org](http://www.lausd-oehs.org).

<b>Date:</b>		<b>OEHS Inspector:</b>		
<b>School:</b>		<b>OAR:</b>		
<b>Designated Area:</b>		<b>Principal:</b>		
<b>A. Access and Egress</b>		<b>Y</b>	<b>N</b>	<b>ALT</b>
1.	Are pathways to and from buildings adequately marked, unobstructed, and free of debris and tripping hazards?			
2.	Are the areas of the campus to be occupied adequately segregated from ongoing construction activity through the use of barricades, fencing or other means?			
3.	Are stairways, halls, and other exit pathways in all building corridors clearly identified with proper signage?			
4.	Are fire doors and associated panic hardware functional?			
5.	Are there at least 2 exit pathways for rooms with an occupant load greater than 50?			
6.	Are designated parking areas for students and staff provided with clear, unobstructed pathways to buildings or other areas of the campus?			
7.	Have student pick-up and drop-off locations been designated and have parents been notified?			
<b>B. Building &amp; Room Conditions</b>				
1.	Is adequate lighting provided in all rooms?			
2.	Are electrical outlets and panels covered, and are other electrical components and wiring properly guarded and functional?			
3.	Has each classroom been provided with a hard-wire or wireless connection capable of calling 911?			
4.	Are flooring materials, walls, and ceilings installed and properly finished?			
5.	Have the HVAC duct leakage test results for passive smoke-control systems been reviewed and accepted by the designer?			
6.	Are rooms properly ventilated and free of significant chemical odors?			
7.	Is potable water available in all buildings?			
8.	Is hot water available in food preparation areas, nurse's office and showers?			
9.	Are classrooms and other areas of the campus clean and free of construction debris?			
10.	Are restrooms available in proper working condition and adequately stocked with toilet paper, soap and paper towels or dryers?			
11.	Has the test and balance report for the HVAC system been submitted by the contractor and reviewed by the Inspector of Record to ascertain that the minimum ventilation rates have been met?			
<b>C. Fire Alarm and Suppression Systems</b>				
1.	Has the Inspector of Record (IOR) notified the local fire department of the new school opening pursuant to Inspection Department Procedure P-13?			
2.	Has the IOR issued a DSA-Form 6 for the buildings to be occupied, indicating the fire alarm and suppression systems are complete?			
3.	Has a local fire department inspection been scheduled by the IOR/OAR to be conducted the week prior to opening? (Required only if DSA-Form 6 does not indicate 100% completion for fire alarm and suppression systems 30 days prior to opening. Indicate date of scheduled inspection.)			
4.	Have fire extinguishers been mounted throughout the campus (within 75 feet of classrooms and 25 feet of flammable liquids storage areas)?			
5.	Has the IOR verified that all outstanding smoke barrier requirements have been completed?			
<b>D. Emergency Preparedness</b>				
1.	Are basic first-aid kits provided and readily accessible?			
2.	Has an emergency evacuation plan been prepared and posted?			
3.	Has staff been informed of their roles and responsibilities during emergencies and aware of the evacuation plan?			
<b>E. Clearance for Occupancy</b>				
1.	Has the Owner's Authorized Representative (OAR) issued a <i>Certificate of School Functional Readiness</i> , and has the IOR issued a DSA-Form 6 indicating the facility or designated locations are ready for occupancy?			
2.	Has OEHS assessed compliance with the above requirements and determined the designated areas are safe to occupy?			

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

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**Occupancy Approval Criteria for Completed School Projects**

Newly constructed schools, additions, or other school projects which add classrooms or when a Department of State Architects' (DSA) Form 6 is issued shall not be approved for occupancy until:

1. The Inspection Department issues a DSA Form 6 indicating the Fire Alarm / Fire Suppression Systems are 100% complete; and
2. OEHS issues an Essential Safety Checklist & Approval Form indicating all essential safety requirements have been met.

Exceptions to this requirement can be made for defined areas of the school if the Inspection Department and OEHS determine those areas are safe and ready for occupancy, and the local fire authority concurs. Sufficient time must be provided when requesting concurrence from the local fire authority. Accordingly, if the DSA Form 6 does not indicate 100% completion for the FA/FS system 30 days prior to the scheduled school opening, the IOR or OAR must immediately schedule a local fire department inspection to be conducted during the week prior to opening day.

For projects where DSA approval is not required, exceptions to this requirement can be made by the Chief of the Inspection Department and the Director of OEHS or their designees.