

## Project Memorandum

### Los Angeles Pierce College Sewer Line Replacement Project

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**FROM:** Stephanie Khoury  
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**DATE:** February 18, 2026

**SUBJECT:** Applicable California Environmental Quality Act (CEQA) Exemptions for Los Angeles Pierce College Sewer Line Replacement Project, in the Neighborhood of Woodland Hills, City of Los Angeles, Los Angeles County, California

### Purpose and Intent of the Memorandum

Best, Best, and Krieger (BBK), acting on behalf of the Los Angeles Community College District (LACCD), requested an evaluation of the applicability of State CEQA Guidelines Article 18 (Statutory Exemptions) and Article 19 (Categorical Exemptions) for the campus-wide Sewer Line Replacement Project at Los Angeles Pierce College (LAPC). The California Secretary for Resources has found that the statutorily and categorically exempt classes of projects do not have a significant effect on the environment, and do not require the preparation of environmental documents (State CEQA Guidelines Section 15300).

The specific exemptions discussed are:

- Categorical Exemption, Class 1, Existing Facilities (State CEQA Guidelines, California Code of Regulations, Title 14, Division 6, Chapter 3, Section 15301)
- Categorical Exemption, Class 2, Replacement or Reconstruction (State CEQA Guidelines, California Code of Regulations, Title 14, Division 6, Chapter 3, Section 15302)
- Statutory Exemption, Emergency Projects (California Public Resources Code, Section 21080(b)(4); State CEQA Guidelines, California Code of Regulations, Title 14, Division 6, Chapter 3, Section 15269)

This memorandum provides a brief background on the applicability of these CEQA exemptions and confirms and discusses how they apply to the Proposed Project.

### Environmental Setting

**Existing LAPC Setting.** The Proposed Project is located within the LAPC campus, an 82-acre community college campus located at 6201 Winnetka Avenue, Woodland Hills, CA 91371. As is characteristic of developed, educational uses, minimal vegetation is present on much of the eastern half of the LAPC campus outside of established landscape features. However, the western half of the LAPC campus consists of agrarian uses serving the LAPC agricultural operations program, and thus largely contains grazing fields and fenced animal pens. US Route 101 and State Route 27 (Topanga Canyon Boulevard) are the primary transportation corridors closest to the Project site, and are located approximately 0.7 and 1.0 miles from the LAPC campus, respectively. According to the State Water Resources Control Board (SWRCB) GeoTracker website (SWRCB, 2026) and Department of Toxic Substances Control (DTSC) Envirostor (DTSC,

2026) website, the LAPC campus does not contain an open or active hazardous waste site pursuant to Section 65962.5 of the Government Code.

## Proposed Project Description

**Project Overview.** The Proposed Project involves the campus-wide replacement of aging and damaged sewer line utility infrastructure, including a segment of sewer line owned by the City of Los Angeles via easement. The existing sewer infrastructure system was originally constructed using clay pipe that is almost 80 years old and is obsolete, far beyond its useful service life. The Proposed Project would repair and replace the sewer system, which is at risk of catastrophic failure and presents a serious health and life safety hazard to students, faculty, staff, and the public. The Proposed Project is classified in the State Capital Outlay system as a Category A-4 project for immediate failing infrastructure (CCCCO, 2024).

**Proposed Site Improvements.** The construction of the Proposed Project would not require the demolition of any existing buildings. Approximately 6,500 linear feet of sewer lines ranging from 8 to 12 inches and an average of 12 feet deep would be replaced throughout campus. Replacements would be broken into sections (manhole to manhole) based on existing manhole infrastructure on the LAPC campus. Each section of the line would be rerouted or routed in parallel to avoid outages. The DigAlert database would be consulted prior to Project activities to confirm that other underground utilities would not be affected.

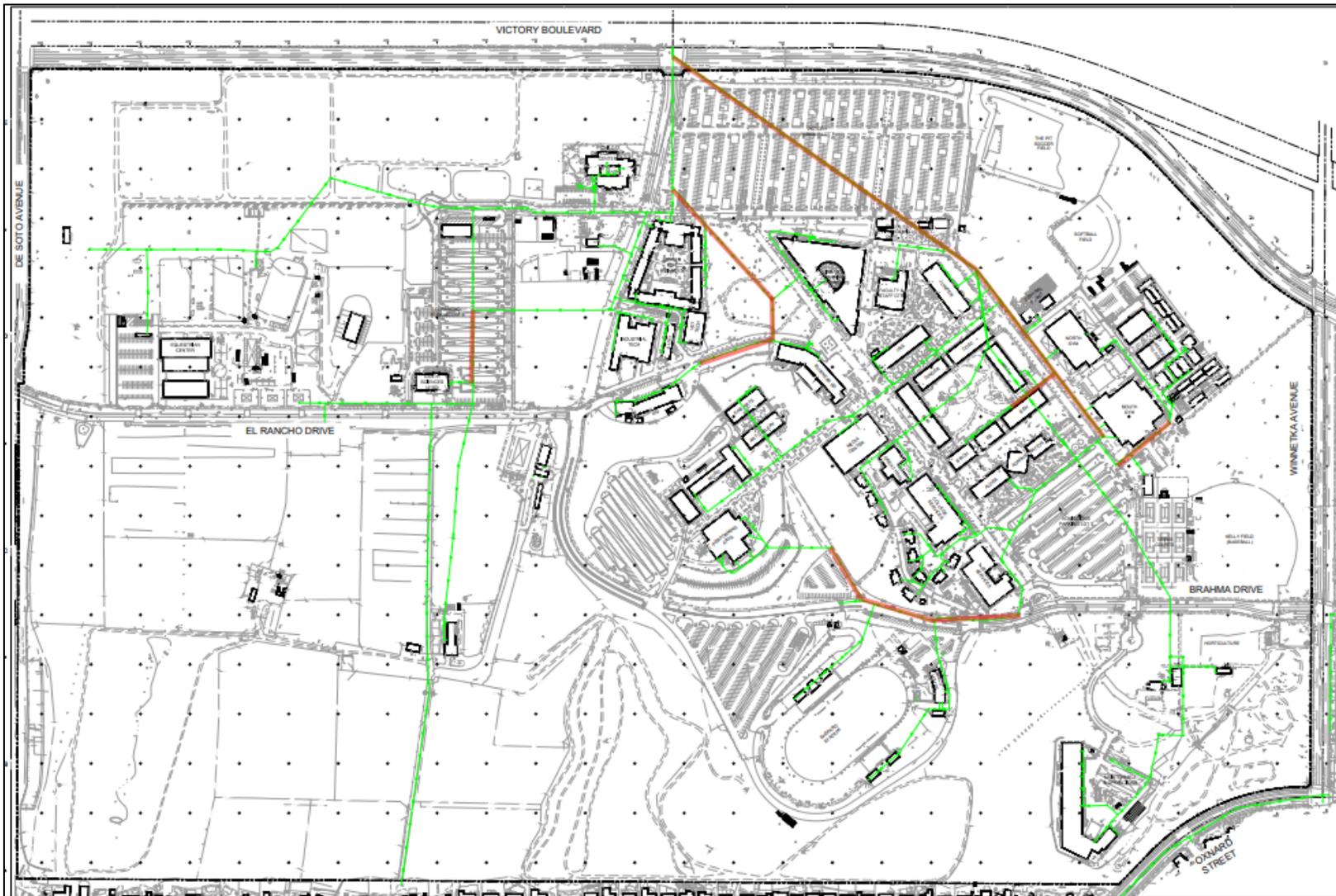
Trenching would be used to replace all sewer lines, which consists of excavating land until the entirety of the sewer line section is exposed before workers manually conduct repairs or replacement. All excavations would occur in previously disturbed areas of the LAPC campus. The Proposed Project would repair failing existing sewer utilities by replacing existing, deteriorated infrastructure with new lines. The overall capacity of the LAPC sewer system would remain the same, and no additional utility infrastructure would be replaced as part of Project activities.

**Proposed Facility Operations.** The replaced sewer lines would operate identically and in the same locations as the existing sewer system on the LAPC campus, including such routine maintenance practices as regular inspections, drain cleaning, and tree root management. The capacity of the LAPC sewer system would not be increased by the Proposed Project, and the public sewer system capacity would not need to be expanded.

**Project Location.** As shown in Figure 2, the Project site includes sewer line replacements across portions of the LAPC campus (shown in red), extending as far north as Mason Avenue and Victory Boulevard, South Gym and Pierce Village in the east, Brahma Drive in the south, and Parking Lot 8 in the west. Areas that would undergo trenching include Rocky Young Park, Park Lane, Avenue of the Champions, Parking Lot 4, 7, and 8, and southwest of the North and South Gyms. All excavation would occur in previously disturbed areas of the LAPC campus.

**Project Construction.** Project construction would take approximately 26 months and is estimated to commence in December 2026 and be completed in February 2029. Construction would occur on Mondays through Fridays from 7:00 a.m. to 5:00 p.m. Construction would be intermittent and focused during specific times to minimize disruption to students, faculty, and visitors. Construction noise would follow all requirements in the City of Los Angeles Municipal Code (City of Los Angeles, 2026c). Staging and employee parking would be provided at a variety of locations across the LAPC campus, depending on the lines being replaced. If necessary, off-campus locations would also be secured for employee parking or materials staging. All workers would be trained on proper material delivery and storage practices. If construction materials are to be stored on site, storage areas would be located away from vehicular traffic to the extent feasible. Construction personnel would avoid exposure of applied materials such as paint to rainfall and runoff unless sufficient time has been allowed for them to dry.

Figure 2. Sewer Replacement Locations



Note: Red lines indicate proposed sewer replacement locations.

**Project Approvals.** Following approval of the Proposed Project, LACCD would proceed with filing the necessary Notice of Exemption (NOE) with the County Clerk and State Clearinghouse at the California Governor's Office of Land Use and Climate Innovation. Additionally, the Proposed Project would comply with all applicable Building Codes and General Plan standards.

## Analysis

### Categorical Exemptions

The following provides the categorical exemptions applicable to Project activities.

State CEQA Guidelines Section 15301, "Existing Facilities," states:

*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 existing or former use. The types of "existing facilities" itemized below are not intended to be all-inclusive of the types of projects which might fall within Class 1. The key consideration is whether the project involves negligible or no expansion of use. Examples include but are not limited to:*

*(a) Interior or exterior alterations involving such things as interior partitions, plumbing, and electrical conveyances.*

*(b) Existing facilities of both investor and publicly owned utilities used to provide electric power, natural gas, sewerage, or other public utility services.*

*(d) Restoration or rehabilitation of deteriorated or damaged structures, facilities, or mechanical equipment to meet current standards of public health and safety, unless it is determined that the damage was substantial and resulted from an environmental hazard such as earthquake, landslide, or flood.*

**Justification:** The Proposed Project would replace existing deteriorated sewer lines across the LAPC campus. The sewer lines are publicly owned utilities used to provide sewerage services. The existing deteriorated sewer lines would be replaced to meet current standards of public health and safety. The Project would not expand sewer capacity or use.

State CEQA Guidelines Section 15302, "Replacement or Reconstruction," states:

*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, including but not limited to:*

*(c) Replacement or reconstruction of existing utility systems and/or facilities involving negligible or no expansion of capacity.*

**Justification:** As shown in Figure 2, the Proposed Project would be located at existing sewer line sites, would serve the same purpose as existing sewers, and would not expand sewer capacity or require expansion of the public sewer system.

If the project is categorically exempt, then the lead agency must consider whether the categorical exemption is negated by an "exception" to the categorical exemption. These exceptions apply under the following circumstances described in CEQA Guidelines Section 15300.2 (a)-(f):

*(a) Location. Classes 3, 4, 5, 6, and 11 are qualified by consideration of where the project is to be located – a project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment be significant. Therefore, these classes are considered to apply all instances, except*

*where the project may impact on an environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies.*

**Justification:** The Proposed Project is not in a particularly sensitive environment due to the Project's location in an existing developed college campus, within previously disturbed soils and sewer right-of-way, and would not impact a designated environmental resource of hazardous or critical concern as detailed in the full discussion under *Further Analysis*, below. The Project site consists of developed school campus areas in a heavily urban setting. Therefore, this exception does not apply to the Proposed Project.

- (b) *Cumulative Impact. All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant.*

**Justification:** Several projects have been identified that may occur at the same time as the Proposed Project: Parking Lot 5 Stormwater Project, Rocky Young Park Improvements, Campus Mall Renovation Project, and Athletic Fields Project. However, these projects would all be campus projects such that coordination between them to reduce any potential cumulative impacts would be implemented. These projects are all minor campus improvements occurring in different locations throughout LAPC and are different types of projects involving different activities such as repaving, landscaping improvements, stormwater infrastructure improvements involving shallow excavation and biofiltration system installments, and athletic field renovations. Different construction methods, durations, and disturbance areas across campus would occur such that individual construction-related impacts would be temporary, intermittent, and localized, and would not combine to result in a cumulatively considerable effect. There would be no cumulatively considerable impacts and therefore this exception does not apply to the Proposed Project.

- (c) *Significant Effect. A categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.*

**Justification:** The Proposed Project is located in a developed area and involves replacements of deteriorated and damaged LAPC sewer lines. Project construction is anticipated to be intermittent and short-(approximately 26 months), and would involve trenching to replace the sewer lines. Nothing regarding the Proposed Project's size, location, nature, or scope would be considered "unusual circumstances." Therefore, this exception does not apply to the Proposed Project.

- (d) *Scenic Highways. A categorical exemption shall not be used for a project which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcropping, or similar resources, within a highway officially designated as a state scenic highway. This does not apply to improvements which are required as mitigation by an adopted negative declaration or certified EIR.*

**Justification:** The nearest eligible state scenic highway is the segment of US Route 101 west of its intersection with State Route 27, located approximately 1.5 mile southwest of the Project site (Caltrans, 2026). The Proposed Project would be located at an existing school, and Project activities would not be visible from US Route 101. Therefore, this exception does not apply to the Proposed Project.

- (e) *Hazardous Waste Sites. A categorical exemption shall not be used for a project located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code.*

**Justification:** The Proposed Project would be located within the existing LAPC campus. A search of the entire LAPC campus was conducted on Envirostor and GeoTracker, and the campus and Project site

were not identified as a hazardous waste site by the California Department of Toxic Substances Control or State Water Resources Control Board, nor would they be located near a hazardous waste generator (DTSC, 2026; SWRCB, 2026). This exception does not apply to the Proposed Project.

(f) *Historical Resources. A categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource.*

**Justification:** No historical resources would be affected by the Proposed Project. The Proposed Project would replace a variety of sewer lines across the LAPC campus, and the associated construction activities would not occur in proximity to an identified historical resource, as none have been identified on the LAPC campus according to the Canoga Park-Winnetka-Woodland Hills-West Hills Community Plan's General Plan Land Use Map (City of Los Angeles, 2013). Therefore, this exception does not apply to the Proposed Project.

### Further Analysis

Because the Proposed Project has been designed to avoid potential adverse effects and use construction best management practices (BMPs), the categorical exemptions identified above would apply to the Proposed Project and the exceptions denoted in State CEQA Guidelines Section 15300.2 (a)-(f) as described above and supplemented below would not apply.

The Proposed Project would replace existing sewer lines at a variety of locations across the LAPC campus, which is consistent with eligible Class 1 and Class 2 categorical exemptions listed in CEQA Guidelines Sections 15301 and 15302. The Proposed Project would not impact adjacent land uses or sensitive natural resources. Project construction would also be subject to existing law and BMPs to avoid impacts to nesting birds.

Campus projects occurring at the same time as the Proposed Project would be coordinated to reduce potential cumulative impacts. There would be no cumulatively considerable impacts and therefore this exception does not apply to the Proposed Project.

Project construction would be short-term, lasting approximately 26 months. To maintain adequate educational facilities and services to students while construction is occurring, temporary facilities would be available to students until construction is completed. Work areas would be fenced to ensure the safety of students.

Project construction activities would incorporate BMPs to control fugitive dust, which would ensure compliance with South Coast Air Quality Management District regulations such as Rule 403 (Fugitive Dust). Construction would not occur during evenings and weekends, thereby minimizing noise impacts to adjacent residential land uses. Given the short-term and temporary nature of construction activities and the limited number of workers required, the Proposed Project would not involve "unusual circumstances." The Proposed Project is located on the LAPC campus which is within a developed urban area surrounded by residential and institutional uses. There are no designated state scenic highways or hazardous waste sites near the Project site (Caltrans, 2026; DTSC, 2026; SWRCB, 2026).

There are no known historical resources in proximity to the Project site. The Proposed Project would not involve any construction activities or alteration of land outside of the Project site. The Proposed Project would not cause a substantial adverse change in the significance of a historical resource.

LACCD would implement state law and utilize the following BMPs when implementing the Proposed Project. These BMPs would address any unanticipated cultural resource discoveries, avoid impacts to nesting birds, minimize fugitive dust, and prevent any discharge or runoff of sediment or construction-related materials from the site.

- **Fugitive Dust Control.** As required by SCAQMD Rule 403 (Fugitive Dust), LACCD would implement the best available dust control measures during activities generating fugitive dust. BMPs outlined in Rule 403 that may be utilized during construction, as applicable, are provided below in Table 1.

**Table 1. Best Available Control Measures**

Source Category	Control Measure	Guidance
Backfilling	<ul style="list-style-type: none"> <li>▪ Stabilize backfill material when not actively handling</li> <li>▪ Stabilize backfill material during handling</li> <li>▪ Stabilize soil at completion of activity</li> </ul>	<ul style="list-style-type: none"> <li>▪ Mix backfill soil with water prior to moving</li> <li>▪ Dedicate water truck or high-capacity hose to backfilling equipment</li> <li>▪ Empty loader bucket slowly so that no dust plumes are generated</li> <li>▪ Minimize drop height from loader bucket</li> </ul>
Clearing and grubbing	<ul style="list-style-type: none"> <li>▪ Maintain stability of soil through pre-watering of site prior to clearing and grubbing</li> <li>▪ Stabilize soil during and immediately after clearing and grubbing activities</li> </ul>	<ul style="list-style-type: none"> <li>▪ Maintain live perennial vegetation where possible</li> <li>▪ Apply water in sufficient quantity to prevent generation of dust plumes</li> </ul>
Clearing forms	<ul style="list-style-type: none"> <li>▪ Use sweeping and water spray to clear forms</li> <li>▪ Use vacuum system to clear forms</li> </ul>	<ul style="list-style-type: none"> <li>▪ Use of high-pressure air to clear forms may cause exceedance of Rule requirements</li> </ul>
Crushing	<ul style="list-style-type: none"> <li>▪ Stabilize surface soils prior to operation of support equipment</li> <li>▪ Stabilize material after crushing</li> </ul>	<ul style="list-style-type: none"> <li>▪ Follow permit conditions for crushing equipment</li> <li>▪ Pre-water material prior to loading into crusher</li> <li>▪ Monitor crusher emissions opacity</li> <li>▪ Apply water to crushed material to prevent dust plumes</li> </ul>
Cut and fill	<ul style="list-style-type: none"> <li>▪ Pre-water soils prior to cut and fill activities</li> <li>▪ Stabilize soil during and after cut and fill activities</li> </ul>	<ul style="list-style-type: none"> <li>▪ For large sites, pre-water with sprinklers or water trucks and allow time for penetration</li> <li>▪ Use water trucks/pulls to water soils to depth of cut prior to subsequent cuts</li> </ul>
Demolition mechanical/manual	<ul style="list-style-type: none"> <li>▪ Stabilize wind erodible surfaces to reduce dust</li> <li>▪ Stabilize surface soil where support equipment and vehicles will operate</li> <li>▪ Stabilize loose soil and demolition debris</li> <li>▪ Comply with AQMD Rule 1403</li> </ul>	<ul style="list-style-type: none"> <li>▪ Apply water in sufficient quantities to prevent the generation of visible dust plumes</li> </ul>
Disturbed soil	<ul style="list-style-type: none"> <li>▪ Stabilize disturbed soil throughout the construction site</li> <li>▪ Stabilize disturbed soil between structures</li> </ul>	<ul style="list-style-type: none"> <li>▪ Limit vehicular traffic and disturbances on soils where possible</li> <li>▪ If interior block walls are planned, install as early as possible</li> </ul>

		<ul style="list-style-type: none"> <li>■ Apply water or a stabilizing agent in sufficient quantities to prevent the generation of visible dust plumes</li> </ul>
Earth-moving activities	<ul style="list-style-type: none"> <li>■ Pre-apply water to depth of proposed cuts</li> <li>■ Re-apply water as necessary to maintain soils in a damp condition and to ensure that visible emissions do not exceed 100 feet in any direction</li> <li>■ Stabilize soils once earth-moving activities are complete</li> </ul>	<ul style="list-style-type: none"> <li>■ Grade each project phase separately, timed to coincide with construction phase</li> <li>■ Upwind fencing can prevent material movement on site</li> <li>■ Apply water or a stabilizing agent in sufficient quantities to prevent the generation of visible dust plumes</li> </ul>
Importing/exporting of bulk materials	<ul style="list-style-type: none"> <li>■ Stabilize materials while loading to reduce fugitive dust emissions</li> <li>■ Maintain at least six inches of freeboard on haul vehicles</li> <li>■ Stabilize material while transporting and unloading to reduce fugitive dust emissions</li> <li>■ Comply with Vehicle Code Section 23114</li> </ul>	<ul style="list-style-type: none"> <li>■ Use tarps or other suitable enclosures on haul trucks</li> <li>■ Check belly-dump truck seals regularly and remove any trapped rocks to prevent spillage</li> <li>■ Comply with track-out prevention/mitigation requirements</li> <li>■ Provide water while loading and unloading to reduce visible dust plumes</li> </ul>
Landscaping	<ul style="list-style-type: none"> <li>■ Stabilize soils, materials, and slopes</li> </ul>	<ul style="list-style-type: none"> <li>■ Apply water to materials to stabilize</li> <li>■ Maintain materials in a crusted condition</li> <li>■ Maintain effective cover over materials</li> <li>■ Stabilize sloping surfaces using soil binders until vegetation or ground cover can effectively stabilize the slopes</li> <li>■ Hydroseed prior to rain season</li> </ul>
Screening	<ul style="list-style-type: none"> <li>■ Pre-water material prior to screening</li> <li>■ Limit fugitive dust emissions to opacity and plume length standards</li> <li>■ Stabilize material immediately after screening</li> </ul>	<ul style="list-style-type: none"> <li>■ Dedicate water truck or high-capacity hose to screening operation</li> <li>■ Drop material through the screen slowly and minimize drop height</li> <li>■ Install wind barrier with a porosity of no more than 50% upwind of screen to the height of the drop point</li> </ul>
Staging areas	<ul style="list-style-type: none"> <li>■ Stabilize staging areas during use and at project completion</li> </ul>	<ul style="list-style-type: none"> <li>■ Limit size of staging area</li> <li>■ Limit vehicle speeds to 15 miles per hour</li> <li>■ Limit number and size of staging area entrances/exits</li> </ul>
Stockpiles/Bulk Material Handling	<ul style="list-style-type: none"> <li>■ Stabilize stockpiled materials</li> <li>■ Stockpiles within 100 yards of off-site occupied buildings must not be greater than eight feet in height; or must have a road bladed to the top to allow water truck access or must have an operational water irrigation system that is capable of complete stockpile coverage</li> </ul>	<ul style="list-style-type: none"> <li>■ Add or remove material from the downwind portion of the storage pile</li> <li>■ Maintain storage piles to avoid steep sides or faces</li> </ul>
Traffic areas for construction activities	<ul style="list-style-type: none"> <li>■ Stabilize all off-road traffic and parking areas</li> <li>■ Stabilize all haul routes</li> <li>■ Direct construction traffic over established haul route</li> <li>■ route</li> </ul>	<ul style="list-style-type: none"> <li>■ Apply gravel/paving to all haul routes as soon as possible to all future roadway areas</li> <li>■ Barriers can be used to ensure vehicles are only used on established parking areas/haul route</li> </ul>

Trenching	<ul style="list-style-type: none"> <li>■ Stabilize surface soils where trencher or excavator and support equipment will operate</li> <li>■ Stabilize soils at the completion of trenching activities.</li> </ul>	<ul style="list-style-type: none"> <li>■ Pre-watering of soils prior to trenching is an effective preventive measure. For deep trenching activities, pre-trench to 18 inches soak soils via the pre-trench and resuming trenching</li> <li>■ Washing mud and soils from equipment at the conclusion of trenching activities can prevent crusting and drying of soil on equipment</li> </ul>
Truck Loading	<ul style="list-style-type: none"> <li>■ Pre-water material prior to loading</li> <li>■ Ensure that freeboard exceeds six inches (CVC 23114)</li> </ul>	<ul style="list-style-type: none"> <li>■ Empty loader bucket such that no visible dust plumes are created</li> <li>■ Ensure that the loader bucket is close to the truck to minimize drop height while loading</li> </ul>

Source: SCAQMD, 2005.

- **Worker Environmental Awareness Program (WEAP).** As part of standard construction practices, a Worker Environmental Awareness Program (WEAP) shall be provided to construction personnel prior to the start of ground-disturbing activities. The WEAP shall consist of a brief environmental awareness training incorporated into the construction contractor’s pre-construction meetings. Training shall include an overview of the cultural sensitivity of the Project site and the surrounding area; examples of cultural resources that could potentially be identified during earthmoving activities; and standard procedures to follow in the event that unanticipated cultural resources are identified, including who to contact and appropriate avoidance measures until the find(s) can be properly evaluated; and any other appropriate protocols. Representative photographs of objects considered cultural resources with the potential to occur during construction will be presented in the WEAP training.
- **Inadvertent Discovery of Cultural Resources.** As part of standard construction procedures, if a previously unidentified cultural resource is discovered during construction activities, work in the immediate vicinity of the discovery (generally within 50 feet of the find) shall be temporarily paused until a Secretary of the Interior-qualified archaeologist assesses the nature of the resource. If the archaeologist determines that the finds warrant further consideration, the archaeologist shall consult with the appropriate responsible public agency regarding recommended plans for treatment of the find(s), which may include documentation, avoidance, or other treatment measures consistent with applicable laws and regulations. Construction activities may resume in the area following completion of the evaluation and implementation of any applicable procedures.
- **Inadvertent Discovery of Human Remains.** In the event that human remains, or potential human remains are discovered, construction activities shall be immediately halted. Compliance with California Health and Safety Code Section 7050.5 and Public Resource Code section 5097 is required by law. Under California Health and Safety Code Section 8100, six or more human burials at a single location constitute a cemetery, and willful disturbance of human remains is a felony under Section 7052.
- **Nesting Bird Avoidance and Protection.** As required by the Migratory Bird Treaty Act and California Fish and Game Code, LACCD will implement the following best management practices during construction to avoid impacts to protected nesting birds. A qualified biologist shall conduct pre-construction nesting bird surveys within all suitable habitat in the Project Area and within a 300-foot buffer for passerines and a 500-foot buffer for raptors. Surveys shall be completed within 72 hours prior to the start of construction activities. If active nests (nests containing eggs, nestlings, or fledglings) are detected, the biologist shall establish a no-disturbance buffer to be

maintained until the young have fledged and the nest is no longer active. Standard buffers include 100 feet for passerines and 500 feet for raptors or special-status birds, unless the biologist determines—based on species, nest location, site conditions, and proposed activities—that an adjusted buffer would still avoid disturbance. A qualified biologist shall monitor all active nests within or near the established buffers to ensure compliance and to document nesting status until nesting activity has concluded. All Project personnel shall receive environmental awareness training prior to construction, including instruction on applicable wildlife laws, sensitive bird species, avoidance requirements, and procedures for reporting wildlife incidents. The qualified biologist shall have the authority to halt work if nesting birds may be adversely affected and shall determine when work may safely resume.

### Statutory Exemptions

As stated in State CEQA Guidelines, Section 15260, statutory exemptions are exemptions from CEQA that have been granted by the Legislature. One statutory exemption would be applicable to the Sewer Line Replacement Project as discussed below.

#### **Statutory Exemption, Emergency Projects (California Public Resources Code, Section 21080(b)(4); State CEQA Guidelines, California Code of Regulations, Title 14, Division 6, Chapter 3, Section 15269**

State CEQA Guidelines, Section 15269, Emergency Projects, is a Statutory Exemption under the California Public Resources Code, Section 21080(b)(4).

The text of Section 15269 is as follows (bold text indicates the specific subsection relied upon):

The following emergency projects are exempt from the requirements of CEQA.

- (a) Projects to maintain, repair, restore, demolish, or replace property or facilities damaged or destroyed as a result of a disaster in a disaster stricken area in which a state of emergency has been proclaimed by the Governor pursuant to the California Emergency Services Act, commencing with Section 8550 of the Government Code. This includes projects that will remove, destroy, or significantly alter an historical resource when that resource represents an imminent threat to the public of bodily harm or of damage to adjacent property or when the project has received a determination by the State Office of Historic Preservation pursuant to Section 5028(b) of Public Resources Code.
- (b) Emergency repairs to publicly or privately owned service facilities necessary to maintain service essential to the public health, safety or welfare. Emergency repairs include those that require a reasonable amount of planning to address an anticipated emergency.**
- (c) Specific actions necessary to prevent or mitigate an emergency. This does not include long-term projects undertaken for the purpose of preventing or mitigating a situation that has a low probability of occurrence in the short-term, but this exclusion does not apply (i) if the anticipated period of time to conduct an environmental review of such a long-term project would create a risk to public health, safety or welfare, or (ii) if activities (such as fire or catastrophic risk mitigation or modifications to improve facility integrity) are proposed for existing facilities in response to an emergency at a similar existing facility.
- (d) Projects undertaken, carried out, or approved by a public agency to maintain, repair, or restore an existing highway damaged by fire, flood, storm, earthquake, land subsidence, gradual earth movement, or landslide, provided that the project is within the existing right of way of that highway and is initiated within one year of the damage occurring. This exemption does not apply to highways designated as official state scenic highways, nor any project

undertaken, carried out, or approved by a public agency to expand or widen a highway damaged by fire, flood, storm, earthquake, land subsidence, gradual earth movement, or landslide.

- (e) Seismic work on highways and bridges pursuant to Section 180.2 of the Streets and Highways Code, Section 180 et seq.

**Discussion.** The California State Capital Outlay system supports infrastructure and facilities needs at Community Colleges within the State. As such, the California Community Colleges Chancellor's Office (CCCCO) has released a five-year plan applying to years 2024 to 2029 which presents budgets and outlines high priority projects that are deemed necessary to maintain enrollment at their respective campuses. In the CCCCCO's 2024-2025 Five-Year Capital Outlay Plan (CCCCO, 2024), three Categories of capital outlay projects are identified, each with associated funding goals:

- Health and Safety (Category A): up to 50% of total funding
- Growth (Category G): 35% of remaining funds after funding Category A projects
- Modernization (Category M): 65% of remaining funds after funding Category A projects

The Proposed Project is identified within the CCCCCO's 2024-2025 Five-Year Capital Outlay Plan as one of three Category A projects in the Plan. Specifically, the Proposed Project is classified as a Category A-4 project for Immediate Infrastructure Failure Projects, the intent of which is to repair or replace the immediate failing infrastructure within a structure or campus system, making it an urgent, high-priority project that rises to the level of emergency repairs.

With respect to the Statutory Exemption for Emergency Projects in the State CEQA Guidelines, Section 15269, the Proposed Project falls under Category (b), which consists of emergency repairs to publicly or privately owned service facilities necessary to maintain service essential to the public health, safety or welfare. The majority of the existing infrastructure is far beyond its service life, resulting in frequent sewer line breaks and blockages. Recent service repairs have only addressed short-term needs, and the entire system requires repairs and replacement for long-term safe operation. The deteriorated sewer line serving the campus has reduced reliability and is at risk of failure, overflow, or service interruption due to frequent cracking, fractures, and offset joints. Failure of the sewer system would pose an immediate threat to public health and safety and could result in environmental contamination and disruption of essential campus services. If left untreated, worsening sewer breakages could lead to sinkholes and/or raw sewage leaks, resulting in groundwater contamination, possible campus shutdown, and health and safety hazards to students, faculty, and the public. The Proposed Project is necessary to prevent this emergency condition and would provide necessary long-term public health benefits, prevent campus shutdown, and prevent environmental hazards by providing functioning sewer lines for students and faculty at LAPC, addressing the Category A-4 designation.

## Conclusion

LACCD is a public service provider, and LAPC is an educational use. The purpose of the Proposed Project is to replace the school's deteriorated sewer facilities. Therefore, the categorical exemptions described in State CEQA Guidelines Sections 15301 and 15302 would apply to the Proposed Project. These applicable Class 1 and Class 2 categorical exemptions would not be negated by any of the exceptions listed in CEQA Section 15300.2. The LAPC Sewer Line Replacement Project would not have a significant effect on the environment and is considered exempt from the provisions of CEQA.

Additionally, the Proposed Project is exempt from CEQA under the following statutory exemption:

- Statutory Exemption, Emergency Projects (California Public Resources Code, Section 21080(b)(4) and State CEQA Guidelines, California Code of Regulations, Title 14, Division 6, Chapter 3, Section 15269)

We recommend the filing of an NOE based on this analysis within five days of agency approval of the Proposed Project and categorical exemption.

## References

- Caltrans (California Department of Transportation). California Scenic Highways Map. [https://experience.arcgis.com/experience/47e2009986264718a5a13a2c81382774#data\\_s=id%3AdataSource\\_2-199ba603ee3-layer-4%3A193](https://experience.arcgis.com/experience/47e2009986264718a5a13a2c81382774#data_s=id%3AdataSource_2-199ba603ee3-layer-4%3A193). Accessed January 26, 2026.
- CCCCO (California Community Colleges Chancellor's Office). 2024. 2024-2025 Five-Year Capital Outlay Plan. <https://www.cccco.edu/-/media/CCCCO-Website/docs/report/five-year-capital-outlay-report-2023-2-12-2024-a11y.pdf?la=en&hash=5EAB837FD7DC40365BD2104425908FB4AF66F82A>. Accessed February 2, 2026.
- City of Los Angeles. 1999. Los Angeles City Planning, Canoga Park-Winnetka-Woodland Hills-West Hills Community Plan. Adopted May 3. [https://planning.lacity.gov/odocument/c2a26cca-955f-42ee-8eeb-332f05286c78/Canoga\\_Park-Winnetka-Woodland\\_Hills-West\\_Hills\\_Community\\_Plan.pdf](https://planning.lacity.gov/odocument/c2a26cca-955f-42ee-8eeb-332f05286c78/Canoga_Park-Winnetka-Woodland_Hills-West_Hills_Community_Plan.pdf). Accessed January 22, 2026.
- \_\_\_\_\_. 2013. Los Angeles City Planning, Canoga Park-Winnetka-Woodland Hills-West Hills Community Plan – General Plan Land Use Map. <https://planning.lacity.gov/odocument/9f7a06bc-c521-4622-b14e-97217909b658/cpkplanmap.pdf>. Accessed February 17, 2026.
- \_\_\_\_\_. 2026a. City of Los Angeles Zone Information and Map Access System (ZIMAS). <https://zimas.lacity.org/>. Accessed January 22, 2026.
- \_\_\_\_\_. 2026b. City of Los Angeles Zoning Code. <https://zoning.lacity.gov/>. Accessed January 22, 2026.
- \_\_\_\_\_. 2026c. City of Los Angeles Noise Municipal Code (LAMC). LAMC Chapter IV, Article 1, Section 41.40; Chapter XI, Article 2, Sections 112.04 and 112.05. [https://codelibrary.amlegal.com/codes/los\\_angeles/latest/lamc/0-0-0-128777](https://codelibrary.amlegal.com/codes/los_angeles/latest/lamc/0-0-0-128777). Accessed February 17, 2026.
- DTSC (Department of Toxic Substances Control). 2026. EnviroStor. <https://www.envirostor.dtsc.ca.gov/public/>. Accessed January 19, 2026.
- SCAQMD (South Coast Air Quality Management District). 2005. Rule 403 – Fugitive Dust. <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403.pdf>. Accessed February 17, 2026.
- SWRCB (State Water Resources Control Board). 2026. GeoTracker. <https://geotracker.waterboards.ca.gov/> Accessed January 19, 2026.