

Attachment to Notice of Exemption
Temecula Elementary School Renovation Project
Temecula Valley Unified School District
Supplemental Information

The Temecula Valley Unified School District (District) proposes to make improvements and renovations at Temecula Elementary School. This supplemental information provides justification for the Categorical Exemption pursuant to the California Environmental Quality Act (CEQA) Guidelines under California Code of Regulations, Title 14, Sections 15301, 15302, 15303, 15311, and 15314.

1. EXISTING CONDITIONS

PROJECT LOCATION

Temecula Elementary School campus (campus) is at 41951 Moraga Road in the City of Temecula, Riverside County (see Figure 1, *Regional Location*). The Temecula Elementary School serves grades transitional kindergarten (TK) through fifth (5th) grade and had an enrollment of 495 students in 2024 (California Dashboard 2025). Regional access to the campus is provided by Interstate 15 (I-15). Local access to the campus is provided by two driveways (eastern driveway and western driveway) along Margarita Road and three driveways (northern driveway, central driveway, and southern driveway) along Moraga Road (see Figure 2, *Local Vicinity*).

EXISTING CONDITIONS

The project site is developed with a pool and pool storage building, portable classroom building and associated structures, and Classroom Building 15 Plex in the northern portion of the campus. It includes an existing student drop-off area and administration building in the central part of the campus and Classroom Building 12 Plex in the southern part of the campus (see Figure 3, *Aerial with Photo Locations*, and Figure 4, *Site Photographs*).

SURROUNDING LAND USES

The campus, including the project site, is bordered by Margarita Road to the north, Moraga Road to the east, a waterway to the south, and Margarita Community Park to the west. Further north, on the opposite side of Margarita Road, are residential uses; further east, on the opposite side of Moraga Road, are residential uses; further south, on the opposite side of the waterway, is a place of worship; and further west, on the opposite side of the park, are residential uses.

2. PROJECT DESCRIPTION

The proposed project consists of two increments (Increment 1 and Increment 2). Increment 1 includes the demolition of the pool and pool storage building; demolition of the pavement, landscaping (nine bushes and four trees), and shade structure surrounding the portable classroom; relocation of the portable classroom (with new ramps) and construction of a new playground and shade structure (replacing the pool and pool storage building); removal and replacement of the existing driveway at the northeast corner

of the project site with a wider driveway approach that would support bus egress; construction of a new parking lot along Margarita Road (Parking Lot C) that would provide ingress from the off-site driveway west of the project site, nine standard parking stalls, and one Americans with Disabilities Act (ADA) parking stall; construction of a bus drop-off area in Parking Lot C; and restriping of the central portion of the paving along the sidewalk for the existing student drop-off area. Increment 1 would not increase classroom building sizes nor add new classrooms to the campus.

Increment 1 would also include the construction of an ADA path of travel along the eastern portion of Parking Lot C, the existing pathway along the easternmost driveway along Margarita Road, and internally from the northern part of the campus to the proposed playground area. Moreover, Increment 1 would install landscaping in Parking Lot C, install storm drain lines and storm drains in the northern part of the project site, construct a retaining wall north of the relocated portable building, and construct a wall east of Parking Lot C and the relocated portable building. The proposed project would connect to existing utility infrastructure within the boundaries of the campus. It would not require connections to infrastructure facilities outside the campus.

The proposed project's modifications to the drive approach for the existing driveway will be reviewed and approved by the City of Temecula.

Increment 2 includes the interior reconfiguration and renovation of the existing administration building and interior renovation improvements to the corridors of classroom buildings 12 Plex and 15 Plex. Increment 2 would include the removal of existing fixtures and installation of new fixtures in the administration building, including plumbing (including a counter sink) and electrical panels. The internal reconfiguration of the administration building would also include the installation of new countertops, casework, mailboxes, refrigerator, vending machine, and copier. The proposed project would upgrade plumbing fixtures to meet ADA requirements; install wall mounted lavatories; install new vinyl tile and rubber base throughout the corridors; and provide new paint for all walls throughout the corridors for Building 12 Plex and Building 15 Plex. Increment 2 would not increase the building footprint of these structures nor add classrooms. Increment 2 does not include exterior renovations to the buildings. Figure 5, *Conceptual Site Plan*, shows the proposed improvements.

CONSTRUCTION

Increment 1 is anticipated to begin in March 2025 and is anticipated to end in August 2025. Increment 2 is anticipated to begin in Summer 2026 and end in Fall 2026. All construction equipment and workers will be staged within the campus, and contractors will adhere to applicable construction noise regulations to avoid disruption to campus operations and the surrounding community.

3. REASONS WHY THE PROJECT IS EXEMPT

The project is exempt from further environmental review under the requirements of the California Environmental Quality Act (Public Resources Code Sections 21000 et seq.) because it is consistent with Class 1, Existing Facilities; Class 2, Replacement or Reconstruction; Class 3, New Construction or Conversion of Small Structures; Class 11, Accessory Structures; and Class 14, Minor Additions to Schools, as explained below.

- **Class 1, Existing Facilities (CEQA Guidelines Section 15301)** 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 key consideration is whether the project involves negligible or no expansion of an existing use.

The proposed project's Increment 2 components involves the interior reconfiguration and renovation of existing structures, including the administration building and classroom corridors (Building 12 and Building 15 Plex), without expanding the building footprint or adding new classrooms. These activities involve minor alterations to existing public structures and facilities. Increment 2 would not result in the expansion of use beyond what is existing. Additionally, the proposed restriping of the existing student drop-off area under Increment 1 would be a minor alteration to an existing public facilities and would not expand the current use. Because the proposed project involves no expansion of an existing use, the proposed project is exempt from CEQA under Section 15301.

- **Class 2, Replacement or Reconstruction (CEQA Guidelines Section 15302)** 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 of the structure replaced.

The proposed project's removal of the existing driveway and its replacement with a wider driveway approach is exempt under CEQA because the modified driveway would serve the same purpose as the existing driveway and would be located on the same site. Therefore, the proposed project is exempt from CEQA under Section 15302.

- **Class 3, New Construction or Conversion of Small Structures (CEQA Guidelines, Section 15303)** 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 in the exterior of the structure.

The proposed relocation of the existing portable classroom with new ramps and the construction of the new playground and shade structure are exempt under CEQA because these actions involve the installation of small new structures and minor accessory facilities on a developed site. Therefore, the proposed project is exempt from CEQA under Section 15303.

- **Class 11, Accessory Structures (CEQA Guidelines, Section 15311)** consists of construction or placement of minor structures accessory to (appurtenant to) existing commercial, industrial, or institutional facilities, including but not limited to: (a) on-premise signs; (b) small parking lots; (c) placement of seasonal or temporary use items such as lifeguard towers, mobile food units, portable restrooms, or similar items in generally the same locations from time to time in publicly owned parks, stadiums, or other facilities designed for public use.

The proposed new playground area, shade structure, and bus drop-off area are exempt from CEQA because these improvements involve the installation of minor structures accessory to an existing institutional use (i.e., school). Additionally, these improvements would support the existing educational facility without altering its primary function. Therefore, the proposed project is exempt from CEQA under Section 15311.

- **Class 14, Minor Additions to Schools (CEQA Guidelines, Section 15314)** consists of minor additions to existing schools within existing school grounds where the addition does not increase original student capacity by more than 25 percent or ten classrooms, whichever is less. The addition of portable classrooms is included in this exemption.

The construction of proposed Parking Lot C and the playground area, the restriping of the student drop-off area, and the installation of the ADA path of travel are exempt from CEQA as these improvements constitute minor additions to an existing school facility that do not increase student capacity by more than 25 percent or ten classrooms. These improvements would enhance accessibility and site functionality without expanding the school's operational capacity. Therefore, the proposed project is exempt from CEQA under Section 15314.

4. REVIEW OF EXCEPTIONS TO THE CATEGORICAL EXEMPTION

The proposed project has been reviewed under CEQA Guidelines Section 15300.2 for any characteristics or circumstances that might invalidate findings that the project is exempt from CEQA. CEQA Guidelines Section 15300.2 identifies five possible exceptions to categorical exemptions.

A. Location

Categorical exemption 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 in all instances, except where the project may have an 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. (§ 15300.2a).

The existing campus, including the project site, does not contain sensitive biological resources. Because the campus, including the project site, is developed and currently operates as a school campus. There is frequent human disturbance throughout the campus, including on the project site. The project site is nearly entirely developed with buildings and hard surfaces and does not contain any sensitive biological species or habitats (see Section C, *Significant Effects*). No mapped wetlands exist on the project site. Riverine habitat (approximately 5.96 acres) is located along the south side of the campus (FWS 2025). At its nearest point, the project site is approximately 40 feet north of the riverine feature (Building 12 Plex); proposed project at this location would include only interior renovations and would not include exterior renovations. The proposed project would comply with applicable best management practices during construction and operation and would not impact the riverine feature. Therefore, the proposed project

would not impact the off-site Riverine habitat. Additionally, there is no evidence of hazardous materials or substances (see Section E, *Hazardous Waste Sites*). Therefore, this exception does not apply to the proposed project.

B. Cumulative Impacts

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. (Section 15300.2b)

The proposed project is the only known and planned improvement to the campus. The construction of the proposed project would occur within the boundaries of the campus, and construction contractors would adhere to applicable construction noise regulations to minimize disruptions to campus operations and surrounding uses to the extent possible. There are routine upgrades and planned projects at other school campuses or properties within the District including the District Office, Abby Reinke Elementary School, Chaparral High School, Temecula Valley High School, Ysabel Barnett Elementary School, Nicolas Valley Elementary School and Margarita Middle School.. Each project would be executed individually. All construction equipment and activities would occur within the boundaries of each site and will not extent to other sites. Further, the nearest project to the proposed project is the Margarita Middle School which is located 2.2 miles northeast of the project site. Due to distance between the sites and the fact that each project would be limited to their respective project sites, the proposed project would not combine with another project to create a cumulative impact during construction.

The proposed project would not alter the existing use at the campus; therefore, the proposed project would not temporarily or permanently alter the operation of the campus. Under proposed project conditions, the campus would continue to operate as an elementary school.

Therefore, the proposed project would not combine with other projects to create a cumulative impact during construction and/or operation. Therefore, this exception does not apply to the proposed project.

C. Significant Effects

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. (Section 15300.2c)

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. The determination whether this exception applies involves two distinct questions: (1) whether the project presents unusual circumstances, and (2) whether there is a reasonable possibility that a significant environmental impact will result from the unusual circumstances. The lead agency considers the second prong of this test only if it finds that some circumstance of the project is unusual. *Berkeley Hillside Preservation v City of Berkeley* (2015) 60 C4th 1086, 1104.

There is no reasonable possibility that the proposed project would have a significant effect on the environment due to unusual circumstances. Proposed improvements would not alter student capacity or

staff at the campus. The construction manager would execute construction activities per applicable laws and District standards and guidelines, and would implement construction best management practices. Construction activities associated with the proposed project would be confined to the project site. The area of ground disturbance is limited, and there are no natural habitats or other unique sensitive resources on the campus, including the project site.

Biological Resources

The proposed project would be entirely within developed areas of the campus. The northern part of the project site includes ornamental bushes and trees. Nine bushes and four trees in this portion of the project site would be removed to construct proposed Parking Lot C of the proposed project. The trees to be removed were identified as *Robinia pseudoacacia* (Black Locust) (1 tree), *Schinus molle* (Pepper Tree) (1 tree), and *Platanus x hispanica* (London Plane Tree) (2 trees), and the bushes to be removed were identified as *Rhaphiolepis indica* (India Hawthorn). These species are not listed as a special-status species by the State or federally listed as endangered or threatened, and they are not on the lists of “Rare Plants of California” or “Special Vascular Plants, Bryophytes, and Lichens” (CDFW 2025a, 2025b).

Nesting birds are protected by the Migratory Bird Treaty Act (MBTA), which governs the taking, killing, possession, transportation, and importation of migratory birds, their eggs, parts, and nests. (US Code, Title 16, Sections 703–712). The MBTA prohibits the take, possession, import, export, transport, sale, purchase, barter, or offering of these activities, except under a valid permit or as permitted in the implementing regulations. Construction of the proposed project will be required to comply with applicable local, state, and federal regulations, such as the MBTA.

Implementation of appropriate state and federal laws, such as the MBTA, and standard best management practices will prevent impacts to special-status species, sensitive vegetation communities, and avian species. No significant impacts on biological resources are identified due to the proposed project.

Transportation

The proposed project would not affect student enrollment or staffing at the campus. The City of Temecula’s “Traffic Impact Analysis Guidelines” (approved 05/10/2011, amended 05/26/20) includes screening criteria that can be used to identify when a proposed land development project can be screened from requiring a vehicle miles traveled (VMT) analysis (Temecula 2020). The guidelines state that a project can be screened from requiring a VMT analysis if the project is a locally servicing public facility. Because the proposed project is a public school district–owned facility, it is in the locally serving public facility category. Therefore, no impacts related to VMT are anticipated because of the proposed project.

As previously discussed, the proposed project includes the construction of a new parking lot (Parking Lot C) that will include nine standard parking stalls, one ADA parking stall, and a bus drop-off zone. Two existing full-access driveways on the project site along Margarita Road would serve this new parking lot. The eastern driveway is within the campus and the western driveway is adjacent to the campus (see Figure 3 and Figure 5). Buses would enter on the western driveway, stop at the drop-off zone, and leave on the eastern driveway, which would be widened to support bus egress. The proposed parking lot and bus drop-

off area would separate existing parent and bus vehicle traffic and improve circulation and safety. The proposed widening of the drive approach for the existing driveway at the project site would be reviewed and approved by the City of Temecula. No modifications are proposed to the existing off-site driveway along Margarita Road, west of the project site.

The proposed Parking Lot C component of the proposed project would not introduce new traffic to the surrounding roadway network because it would not expand the existing use at the project site or campus that could result in changes to student or staff population. This component is intended to improve on-site circulation by providing additional dedicated area for bus queuing and student drop-off/pick-up. Because the proposed project would not affect the daily traffic generated at the project site and because the proposed modifications to the existing on-site driveway would be reviewed and approved by the City of Temecula, the proposed project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. The proposed project would not provide any on- or off-site access or circulation features that would create or increase any design hazards or incompatible uses. Access to the project site and campus would continue to be provided from the existing driveways on campus. Additionally, under proposed project conditions, Parking Lot C would provide an additional point of access from the drive aisle of the existing off-site driveway along Margarita Road, west of the project site and campus. All improvements within the project site would be consistent with the criteria of the California Division of the State Architect. No significant transportation impacts are identified due to the proposed project.

Based on the foregoing analysis, 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 outcroppings, or similar resources, within a highway officially designated as a state scenic highway. (Section 15300.2d)

According to the California Department of Transportation (Caltrans) California Scenic Highway Mapping System, the nearest officially designated state scenic highway is a segment of State Route 74 (SR-74) approximately 24 miles northeast of the campus (Caltrans 2025). The nearest eligible state scenic highway is a segment of I-15 approximately 0.74 miles west of the campus (Caltrans 2025). The proposed project would not affect scenic resources along any officially designated or eligible scenic highways due to varying topography, existing intervening development, and distance. 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. (Section 15300.2e)

California Government Code Section 65962.5 requires designated agencies to compile lists of the certain types of hazardous materials sites: hazardous waste facilities subject to corrective action; hazardous waste discharges for which the State Water Quality Control Board has issued certain types of orders;

public drinking water wells containing detectable levels of organic contaminants; underground storage tanks with reported unauthorized releases; and solid waste disposal facilities from which hazardous waste has migrated.

The following databases were reviewed to determine if the project site is included on a listed compiled pursuant to Section 65962.5 of the Government Code.

- United States Environmental Protection Agency (EPA) EnviroMapper (U.S. EPA 2025a)
- California Department of Toxic Substance Control (DTSC) EnviroStor (DTSC 2025a)
- DTSC Hazardous Waste Tracking System (DTSC 2025b)
- DTSC Hazardous Waste and Substance Site List (Cortese) (DTSC 2025c)
- California Department of Resources Recycling and Recovery (CalRecycle) Solid Waste Information System (SWIS) (CalRecycle 2025)
- California Department of Conservation Well Finder (DOC 2025)
- State Water Resources Control Board (SWRCB) GeoTracker (SWRCB 2025)

Based on review of these databases, the project site is not identified as a hazardous waste site on any list compiled pursuant to Government Code Section 65962.5. Additionally, the project site is not adjacent to a significant disposal of hazardous waste that creates a significant existing or potential hazard. The campus is not in the EPA Multisystem Search database, which provides information about environmental activities that may affect air, water, and land (U.S. EPA 2025b). According to the DTSC Hazardous Waste Tracking System, the campus, including the project site, is identified as an inactive hazardous waste handler (CAC002579582) (DTSC 2025b). Additionally, according to the CalRecycle SWIS database, the project site is not identified as a solid waste facility (CalRecycle 2025).

The campus, including the project site, is not identified as a hazardous waste site on any of the data bases; therefore, the project site is not identified as a hazardous materials site pursuant to Government Code Section 65962.5, and the project would not create a hazard to the public. This exception does not apply to the proposed project.

F. Historic Sites

A categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of historical resources. Under Public Resource Code § 21084.1, a historical resource is a resource listed in or determined to be eligible for listing in the California Register of Historical Resources. Additionally, historical resources included in a local register of historical resources are presumed to be historically or culturally significant, and a lead agency can determine whether the resource may be a historical resource.

According to the United States Department of the Interior National Park Service (NPS) database, there are three properties in the City of Temecula listed on the National Register of Historic Places (NPS 2025). The project site and campus are not identified as one of the three listed properties. According to the California Office of Historic Places, there are 51 properties listed in the Built Environment Resource Directory; however, the project site and campus are not identified as one of the listed properties (OHP 2025a). Additionally, the project site is not on the list of California Historical Landmarks in Riverside County (OHP 2025b). Proposed project implementation would not cause significant impacts to historical resources. This exception does not apply to the proposed project.

G. Conclusion

The proposed project at Temecula Elementary School is exempt from CEQA review pursuant to CEQA guidelines Sections 15301, 15302, 15303, 15311 and 15314. As substantiated in this document, the proposed project would not meet the conditions specified in Section 15300.2, Exceptions, of the CEQA Guidelines, and the proposed project is categorically exempt under Class 1, Class 2, Class 3, Class 11, and Class 14.

5. REFERENCES

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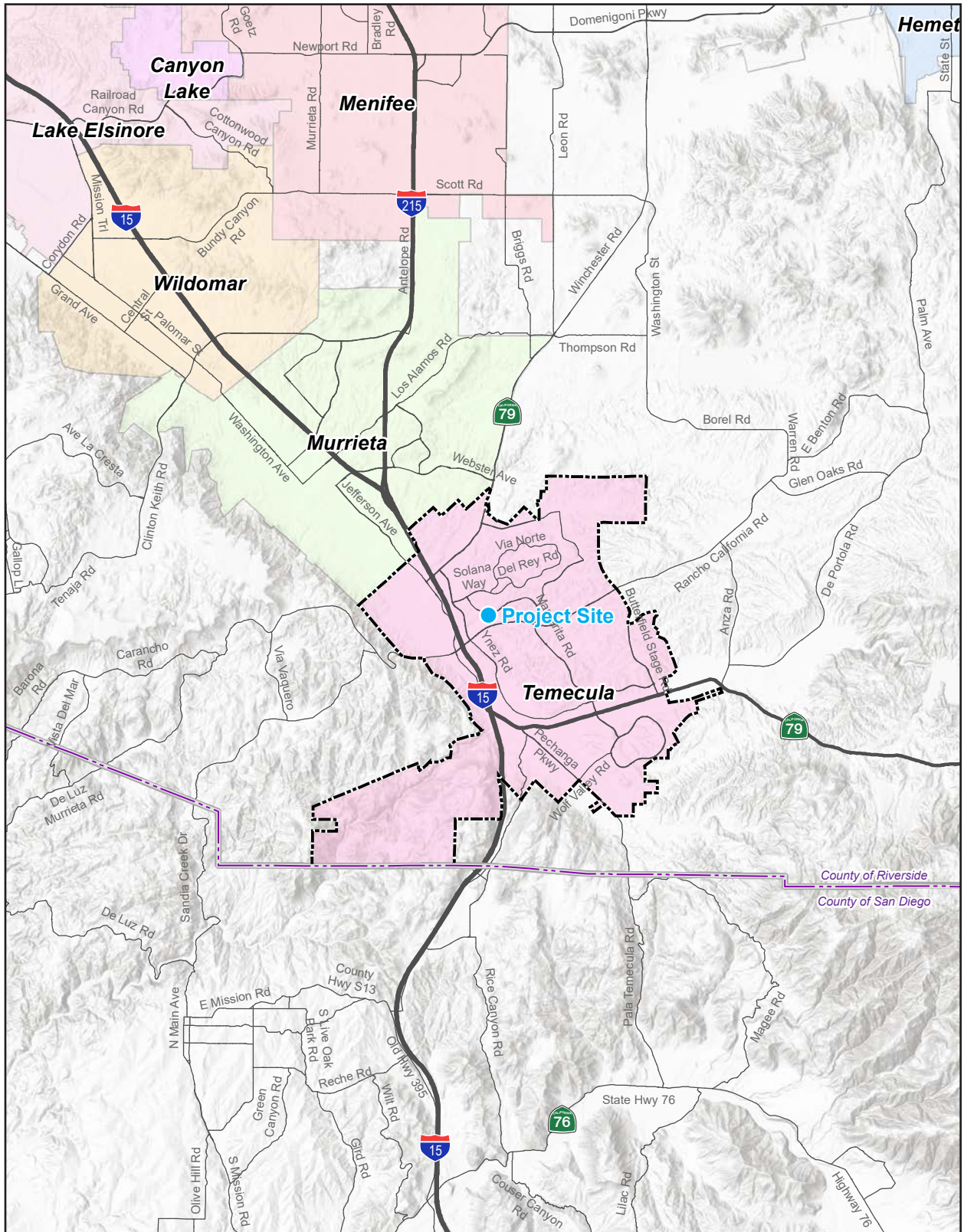
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FIGURES

- Figure 1 Regional Location
- Figure 2 Local Vicinity
- Figure 3 Aerial with Photo Locations
- Figure 4 Site Photographs
- Figure 5 Conceptual Site Plan

Figure 1 - Regional Location



--- County Boundary

--- City of Temecula Boundary

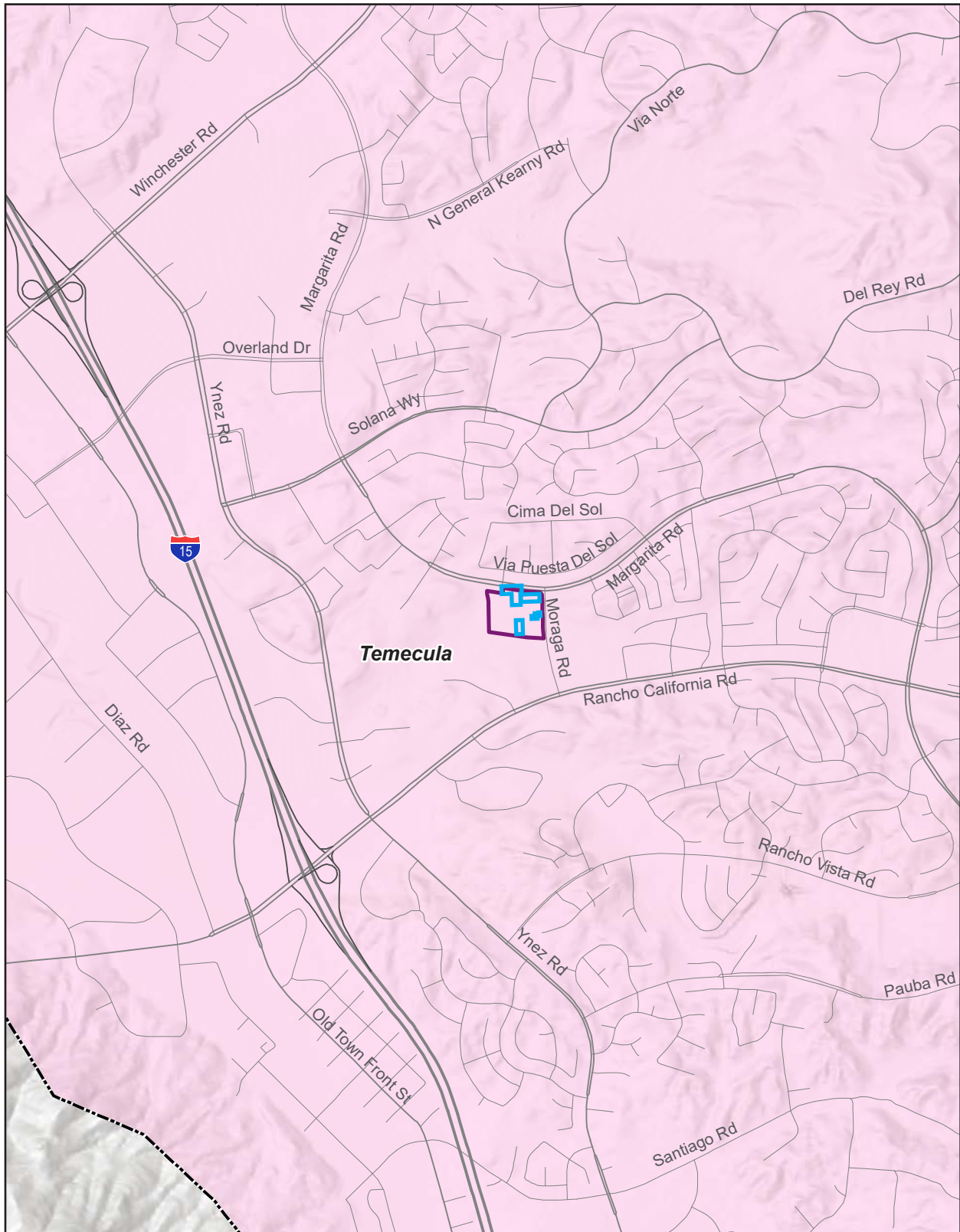
Note: Unincorporated county areas are shown in white.

Source: Generated using ArcMap 2025.

0 3
Scale (Miles)



Figure 2 - Local Vicinity



— School Boundary
— Project Boundary
- - - - - City of Temecula Boundary

Note: Unincorporated county areas are shown in white.
Source: Generated using ArcMap 2025.

0 2,000
Scale (Feet)



Figure 3 - Aerial with Site Photo Location



— School Boundary
— Project Boundary



Project Site
Photograph Locations and Direction (7)



Surrounding Area
Photograph Locations and Direction (5)

0 200
Scale (Feet)



Source: Nearmap 2025.

PlaceWorks

Figure 4 - Site Photographs



1 Photo 1 – From the parking lot west of the project site, looking east towards the existing portable building, shade structure and play area on the project site.



2 Photo 2 – From the northern portion of the project site, looking west towards the existing paved parking lot and portable building on the project site.



3 Photo 3 – From the central portion of the project site, looking west towards the existing pool storage building and pool on the project site.



4 Photo 4 – From the northern boundary of the campus, looking east towards the existing Building 15 Plex on the project site.



5 Photo 5 – From the east parking lot of the campus, looking west towards the existing student drop-off area and existing administration building on the project site.



6 Photo 6 – From the play field in the western portion of the campus, looking east towards the existing Building 12 Plex on the project site.



7 Photo 7 – From the play field in the western portion of the campus, looking east towards the existing pool storage building, pool, and Building 15 Plex on the project site.



8 Photo 8 – From the play field in the western portion of the campus, looking north towards the existing parking lot and residential uses off-campus.



9 Photo 9 – From the western portion of the project site, looking west towards the existing parking lot and playground off-campus.



10 Photo 10 – From the eastern parking lot of the campus, looking east towards an apartment complex off-campus.

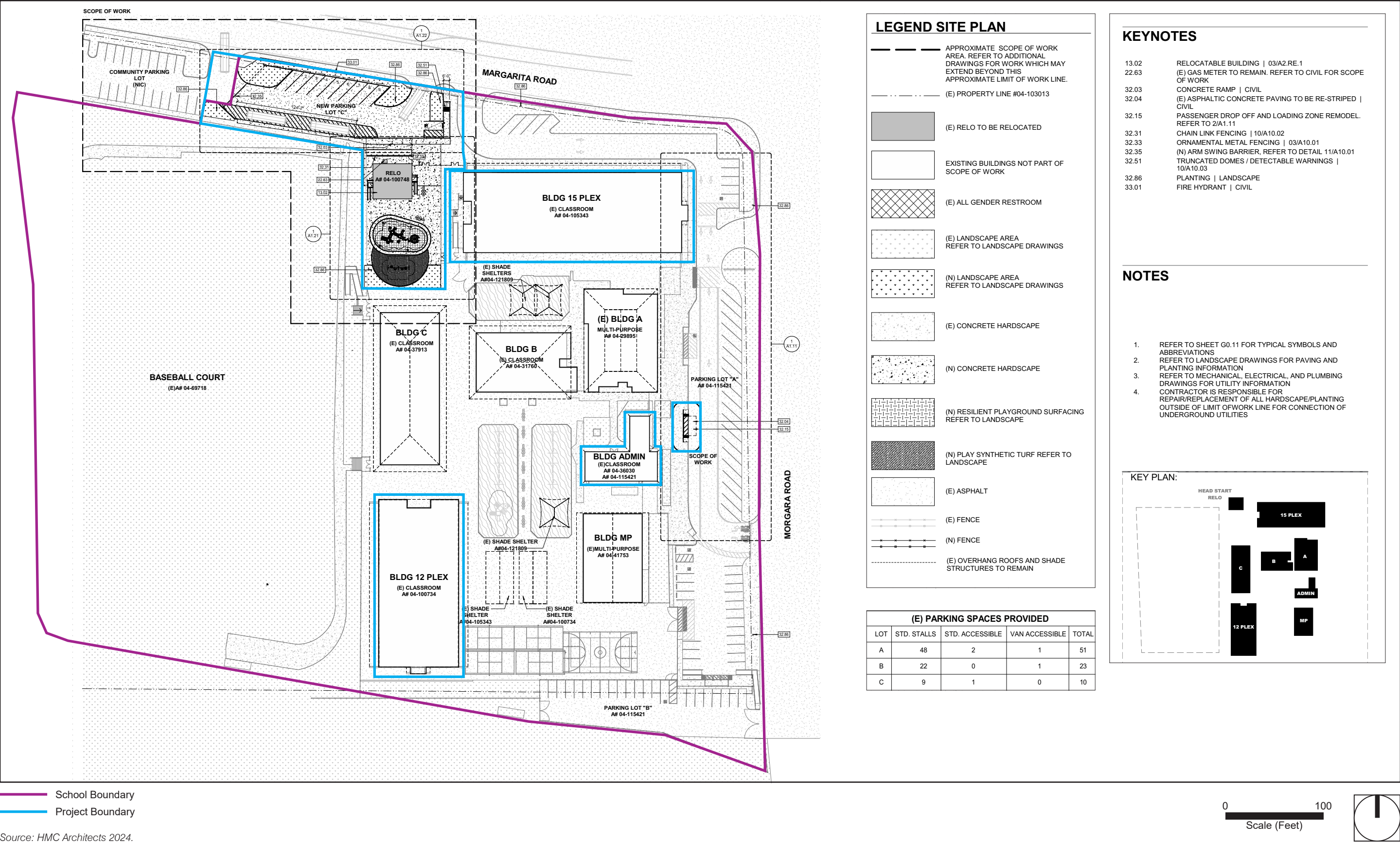


11 Photo 11 – From the southern portion of the campus, looking south towards the waterway and parking lot off-campus.



12 Photo 12 – From the play field in the western portion of the campus, looking west towards the existing playground and recreational facilities off-campus.

Figure 5 - Conceptual Site Plan



Appendix

Appendix A Tree Identification

Appendix A - Tree Identification



— School Boundary
— Project Boundary

0 50
Scale (Feet)



Source: Nearmap 2025.