Attachment to Notice of Exemption

LAUREL SCHOOL LOWER CAMPUS NEW CONSTRUCTION AND MODERNIZATION PROJECT

MENLO PARK CITY SCHOOL DISTRICT

SUPPLEMENTAL INFORMATION

This supplemental information provides justification and substantial evidence for the Categorical Exemption determinations pursuant to the California Environmental Quality Act (CEQA) Guidelines under California Code of Regulations (CCR), Title 14, Sections 15301, 15302, and 15314.

1. EXISTING CONDITIONS

PROJECT LOCATION

The Laurel School Lower Campus project site (project site) is located at 95 Edge Road in the town of Atherton and encompasses approximately 6.5 acres. The project site is situated on a single parcel identified as Assessor's Parcel Number (APN) 061-240-110. The campus is bordered by Ridgewood Avenue to the east, with residential uses across the street; residential uses to the north and west; and Edge Road to the south, with residential uses across the street. Menlo-Atherton High School is approximately 880 feet south of the project site.

Regionally, U.S. Route 101 is approximately 0.6 mile north of the project site, and State Route 84 is approximately 1.1 miles to the north. The regional and local context of the project site is shown in Figure 1, *Regional Location*, and Figure 2, *Local Vicinity*.

EXISTING PROJECT SITE CONDITIONS

The project site is an existing elementary school campus that currently serves students in transitional kindergarten (TK) through second grade, as well as early learning programs. The campus includes TK–second grade classrooms and early learning center classrooms, for a total of 23 permanent classrooms. The campus currently serves approximately 400 students (actual enrollment), including preschool enrollment, and is staffed by approximately 100 personnel (MPCSD 2026).

In addition to instructional spaces, the campus includes a multipurpose room, an administrative building, and various ancillary support spaces typical of an elementary school campus. The original campus buildings were constructed between 1959 and 1960, with additional buildings constructed after 1991. The existing site conditions are shown in Figure 3, *Aerial Photograph*.

GENERAL PLAN LAND USE AND ZONING

The project site is designated Public Facilities and Schools on the Town of Atherton General Plan Land Use Diagram and is zoned Public Facilities and Schools District (PFS) (Atherton 2020, 2026a). The PFS zoning designation provides for the development of public uses (e.g., town hall, corporation yard, and public utilities) and schools (both public and private), consistent with the Town's General Plan (Atherton 2026b).

Surrounding properties to the north, west, and south are designated Low Density Single Family Residential and are zoned R-1A (Atherton 2020, 2026b). Properties within unincorporated Menlo Oaks, immediately east of the project site, are designated Low Density Residential and are zoned One-Family Residential District/Residential Density District 100 (San Mateo County 2026).

2. PROJECT DESCRIPTION

The Menlo Park City School District (District) proposes to modernize the Laurel School Lower Campus, including new construction and replacement of existing facilities. The proposed project includes demolition of select existing campus buildings, construction of new educational facilities, minor renovation of two existing buildings, and associated site improvements.

PROPOSED IMPROVEMENTS

The proposed project would demolish three existing classroom buildings, one administrative building, and one multipurpose building, and replace them with new educational facilities within the same project site.

Buildings and Facilities

The project includes the construction of a new two-story classroom and administration building (Building A–B), which would be divided into Block A and Block B, and connected by an outdoor deck on the second floor. Block A would accommodate transitional kindergarten (TK)/kindergarten classrooms, general education classrooms, and restrooms. Block B would accommodate administrative offices, a library, general education classrooms, and restrooms. Building A–B would total approximately 34,167 square feet, with an additional approximately 9,972 square feet of exterior walkways.

The proposed project also includes construction of a new multipurpose building of approximately 7,614 square feet on the eastern portion of the campus. In addition, the project includes minor renovation of an existing classroom building (Building F) and an existing preschool building (HOCC). Following project implementation, the campus would contain a total of 25 classrooms, representing a net increase of two classrooms compared to existing conditions.

The two-story configuration of Building A–B would concentrate development within a reduced footprint on the southern and western portions of the campus, allowing for the retention of existing open space and play areas in the eastern portion of the campus (see Figure 4, *Site Plan*).

Site Improvements

The proposed project includes site improvements throughout the campus, including new landscaping, pedestrian pathways, accessibility upgrades, and associated site work. Existing outdoor play areas, open space, and recreational facilities would be mostly retained, with modifications as needed to accommodate the new building layout.

Circulation and Parking

The proposed project would not substantially alter existing site access, circulation, or student pick-up and drop-off operations. The existing parking lot along Edge Road would continue to provide 75 parking spaces, including ADA accessible and van-accessible spaces. The existing drop-off area would remain in place and continue to serve campus operations.

Tree Removal and Protection

A tree inventory and arborist report was prepared by Davey Resource Group (DRG) in November 2025. The inventory identified 105 existing trees representing 26 species on the project site, including 43 coast live oaks (*Quercus agrifolia*), 11 Monterey pines (*Pinus radiata*), three valley oaks (*Quercus lobata*), and various ornamental species. Of the 105 inventoried trees, 46 qualify as protected trees pursuant to the Town of Atherton Heritage Tree Ordinance.

Based on project design, five trees (Tree Nos. 34, 45, 52, 53, and 77) are proposed for removal, and two trees (Tree Nos. 50 and 51) are proposed for relocation. The arborist identified all trees recommended for removal and relocation as being in poor or fair health with compromised structure, and recommended their removal based on health conditions independent of construction. An additional 12 trees (Tree Nos. 32, 33, 35, 43, 44, 46, 47, 49, 68, 69, 70, and 71) may be affected depending on final demolition and construction staging. The remaining trees are expected to be retained. Tree numbers 32, 33, 35, 46, 49, and 68 are protected and would be subject to Town of Atherton permitting requirements. The locations of all inventoried trees and their disposition are shown in Figure 5, *Tree Inventory and Removal Plan*.

If, upon final site design, protected trees are identified for removal, required tree removal permits would be obtained from the Town of Atherton prior to removal of any protected trees. Tree protection measures would be implemented during construction in accordance with the recommendations of the DRG Arborist Report and Tree Protection Plan (DRG 2025).

Electrical Upgrades

The proposed project would include an expanded photovoltaic (PV) system with a new battery energy storage system (BESS). It is anticipated that the BESS would be located near the new buildings to support the roof-mounted PV system.

OPERATIONS

The proposed project would increase student capacity from approximately 400 students to up to approximately 450 students. The campus would continue to operate as a TK–second grade school with early learning programs. No substantial changes to daily operations, access, or circulation patterns are proposed.

CONSTRUCTION

Construction of the proposed project is anticipated to occur in a single phase over approximately 24 months. Construction is anticipated to begin in summer 2027 and would be timed to coincide with the school summer recess to allow initial demolition activities to occur when students and staff are not present on campus. Construction is anticipated to be complete by summer/fall 2029.

Construction activities would include demolition, grading, building construction, landscaping, and site improvements. Construction would occur within the boundaries of the existing school property. During construction, the contractor would maintain safe access throughout the campus, including emergency access, and coordinate activities to minimize disruption to ongoing school operations. All construction activities would comply with applicable local regulations, including construction noise standards.

The proposed project would be subject to review and approval by the California Division of the State Architect (DSA) prior to construction.

3. REASONS WHY THE PROJECT IS EXEMPT

The proposed 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 the categorical exemptions known as Class 1, *Existing Facilities*; Class 2, *Replacement or Reconstruction*; and Class 14, *Minor Additions to Schools*, as explained here.

- **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 existing or former use. The key consideration is whether the project involves negligible or no expansion of use.

The proposed project includes minor renovation of an existing classroom building (Building F) and an existing preschool building (HOCC). Further, existing outdoor play areas, open space, and recreational facilities would be mostly retained as part of the modernization; however, modifications may be required to accommodate the new building layout. Proposed renovation and potential modification activities would not alter or expand the existing use of the individual facilities. Therefore, the proposed project qualifies for this exemption under CEQA Guidelines 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 as the structure replaced.

  The proposed project would demolish three existing classroom buildings, one administrative building, and one multipurpose building, and replace them with a new two-story classroom and administration building (Building A-B) and a new multipurpose room on the same project site. Proposed Building A-B is designed to serve the same educational purpose—provision of classroom and administrative functions—as the existing structures it would replace. The proposed project would result in a net increase of up to two classrooms (from 23 to 25 classrooms campus-wide), which constitutes only a minor expansion relative to the existing educational use. The proposed multipurpose room would serve the same function as the existing multipurpose room and would not directly increase student or faculty capacity. All new development would be sited entirely within the existing school property. Because the new structures are on the same site as the structures replaced and will have substantially the same purpose and capacity, the proposed project qualifies for this exemption under CEQA Guidelines Section 15302.

- **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 of the school campus by more than 25 percent or 10 classrooms, whichever is less.

  The proposed project constitutes a minor addition to an existing school campus within existing school grounds. The campus currently contains 23 permanent classrooms. The proposed project would result in a net increase of up to two permanent classrooms, for a total of 25 classrooms. This net increase is below the threshold of 10 classrooms. Student enrollment is projected to increase from approximately 400 to up to approximately 450 students, representing a 12.5 percent increase, which is also below the 25 percent threshold for student capacity.

  The new multipurpose room and administrative component are ancillary school facilities that support educational operations. The proposed project also includes the construction of site improvements throughout the campus, including electrical upgrades, new landscaping, pedestrian pathways, and accessibility upgrades. These improvements are consistent with the scale and function of existing campus features and would ensure safety and accessibility. All improvements are entirely within the existing school grounds. Therefore, the proposed project qualifies for this exemption under CEQA Guidelines Section 15314.

4. REVIEW OF POTENTIAL EXCEPTIONS TO CATEGORICAL EXEMPTIONS

The proposed project has been reviewed under CEQA Guidelines Section 15300.2, *Exceptions*, for any characteristics or circumstances that might invalidate findings that the project is exempt from CEQA. Each exception is listed below followed by an assessment of whether that exception applies to the project.

A. Location. Classes 3, 4, 5, 6, and 11 are qualified by consideration of where the project would 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 to 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.

The location exception under Section 15300.2(a) applies specifically to Classes 3, 4, 5, 6, and 11. The proposed project relies on Classes 1, 2, and 14, to which this exception does not expressly apply. The proposed project is entirely within the existing school site, a developed institutional site within a residential area of the town. As described herein, the project site is not within a designated sensitive environmental resource area of hazardous or critical concern pursuant to State, federal, or local law. 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.

The proposed project is not part of a series of successive projects of the same type in the same place. The project involves the replacement and modernization of existing school buildings within an existing campus, which is a single, discrete undertaking to address the District's long-term programmatic and facility needs. The proposed project improvements are limited to the project site and will not combine with any other project to create cumulative impacts. The surrounding residential uses do not include planned development that would combine with the proposed project to create significant cumulative impacts. 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.

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 would 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 Cal.4th 1086, 1104*.).

The proposed project does not present unusual circumstances nor any special environmental constraint that might result in a significant impact. The campus has operated as an elementary school for many years in a developed residential area of the town. The proposed modernization involves replacement of three existing classroom buildings, one administrative building, and one multipurpose building with new educational facilities using standard construction methods, all within the existing 6.5-acre school property. Construction would be required to comply with applicable building codes, DSA requirements, air quality standards, water quality standards, inadvertent discovery procedures, and best management practices. The proposed project would not alter existing circulation or pick-up/drop-off areas. Operation of the campus following project completion would not substantially differ from existing conditions, except for a modest increase in student enrollment from approximately 400 to up to 450 students.

The proposed BESS is required in compliance with the 2022 Energy Code and would not be considered an unusual circumstance of the proposed project, as it is required by CCR, Title 24, Part 6, Section 140.10. Assuming the BESS generates a noise level of 70 dBA at 3 feet, which is anticipated given the specifications of the BESS, the noise level would be reduced to 46 dBA at 50 feet from the proposed BESS unit, due to distance attenuation alone. Therefore, noise associated with the BESS would not result in an exceedance of the 60 dBA daytime (7 a.m. to 10 p.m.) or 50 dBA nighttime (10 p.m. to 7 a.m.) noise standards as included in Section 8.16.030, *Basic Noise Regulation Sound Level Limits*, of the Town of Atherton Municipal Code given the anticipated noise generation, shielding provided by intervening on-site structures, and distance to sensitive receptors.

The U.S. Forest Service (USFS) Existing Vegetation: Region 05 mapping program classifies the project site as “urban,” which tends to have low to poor wildlife habitat value due to replacement of natural communities, fragmentation of remaining open space areas and parks, and intensive human disturbance (USFS 2026). The project site is in an urban area with limited access to natural areas and associated wildlife habitat. The proposed project would require the removal of five trees (Tree Nos. 34, 45, 52, 53, and 77) and the relocation of two trees (Tree Nos. 50 and 51), as documented in the Arborist Report and Tree Protection Recommendations (DRG 2025). Given the health of the trees proposed for removal and relocation, removal of these trees would not require tree removal permits. An additional 12 trees (Tree Nos. 32, 33, 35, 43, 44, 46, 47, 49, 68, 69, 70, and 71) may be affected depending on final demolition and construction staging. The remaining trees are expected to be retained. Tree numbers 32, 33, 35, 46, 49, and 68 are protected and would be subject to Town of Atherton permitting requirements prior to removal of any protected trees pursuant to the Town’s Heritage Tree Ordinance, and tree protection measures would be implemented per the DRG arborist’s recommendations for all trees to be retained. None of the trees proposed for removal are State or federally listed as endangered, threatened, or rare plants of California, nor are any species included on the California Department of Fish and Wildlife’s Special Vascular Plants, Bryophytes, and Lichens List (CDFW 2026a, 2026b). The tree species present on site, including coast live oak

(*Quercus agrifolia*), Monterey pine (*Pinus radiata*), and valley oak (*Quercus lobata*), are common in the region and are not listed under State or federal endangered species laws.

Therefore, the proposed project would not result in a significant environmental impact and would not result in any unusual circumstances, and 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.

According to the California Department of Transportation (Caltrans) California Scenic Highway Mapping System, the nearest officially designated state scenic highway to the project site is a segment of State Route (SR) 280 approximately 4.4 miles southwest of the project site and the nearest eligible state scenic highway to the project site is a segment of SR 280 approximately 4.2 miles southwest of the project site (Caltrans 2026). Due to distance and intervening development and topography, the project site would not be visible from either segment of SR 280. Therefore, the proposed project would not affect scenic resources along any officially designated or eligible scenic highways, and 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 Government Code Section 65962.5.
The required lists of hazardous material release sites are commonly referred to as the "Cortese List," named for the legislator who authored the legislation. The project site is not included on the Hazardous Waste and Substances Site List (Cortese) pursuant to Government Code Section 65962.5 (CalEPA 2026a).

The following environmental databases were searched for hazardous materials sites on the project site and within a quarter-mile radius:

- EnviroStor, Department of Toxic Substances Control (DTSC 2026a; DTSC 2026b)
- GeoTracker, State Water Resources Control Board (SWRCB 2026a; SWRCB 2026b)
- Solid Waste Facilities, Cortese List (CalEPA 2026b)
- Site Cleanup Program, Cortese List (CalEPA 2026c)
- Hazardous waste facilities subject to Section 25187.5 of the Health and Safety Code, Cortese List (CalEPA 2026d)

The database search did not identify any active hazardous materials sites on or within a 0.25-mile radius of the project site. As a result, the project site is not identified as active hazardous materials sites pursuant to Government Code Section 65962.5. 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 historical resources.

Under Public Resource Code Section 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.

An architectural history evaluation was prepared by EBA in February 2026 (NWIC No.: 25-1121; EBA No.: 2026-007) to assess whether any buildings on the Laurel School Lower Campus are eligible for listing on the California Register of Historical Resources. The evaluation examined all 10 buildings and 2 structures on the campus. Buildings 6 through 12, constructed after 1991, are less than 50 years old and do not meet the minimum age threshold for California Register consideration (EBA 2026). The five original campus buildings (Buildings 1 through 5), constructed in 1959–1960, were evaluated against all four California Register criteria:

- **Criterion 1 (Events):** Not met. The campus was one of many schools constructed post-World War II to accommodate growing student populations and was not found to be particularly or uniquely representative of any significant historical event or pattern of events.
- **Criterion 2 (Persons):** Not met. The campus is not associated with the lives of persons particularly important to local, California, or national history.
- **Criterion 3 (Architecture):** Not met. Although the campus was designed by architect Kingsford Jones, EBA concluded that the buildings are typical of the era and do not rise to the level of a good example of mid-twentieth-century school architecture. While the campus loosely reflects fingerlike and cluster plan architectural styles, it is not a distinguishing representative example of either style.
- **Criterion 4 (Information Potential):** Not met. This criterion does not apply to this type of building resource.

EBA concluded that none of the campus buildings meet any of the criteria for inclusion on the California Register of Historical Resources, and that no further recommendations are warranted (EBA 2026). The Laurel School Lower Campus is not listed on the National Register of Historic Places, the California Historical Landmark list, or the California Points of Historical Interest list, and has not been determined eligible for listing on the California Register of Historical Resources. No historical resources have been identified within 0.25 miles of the project site (NPS 2026; OHP 2026; Atherton 2020). Because the existing buildings proposed for demolition have been evaluated and found ineligible for the California Register, the proposed project will not cause a substantial adverse change in the significance of any historical resource. Therefore, this exception does not apply to the proposed project.

5. CONCLUSION

The proposed project is exempt from CEQA review pursuant to CEQA Guidelines Sections 15301, 15302, and 15314. As substantiated in this document, none of the conditions specified in Section 15300.2 of the CEQA Guidelines apply to the proposed project, and the proposed project is categorically exempt under Classes 1, 2, and 14.

6. REFERENCES

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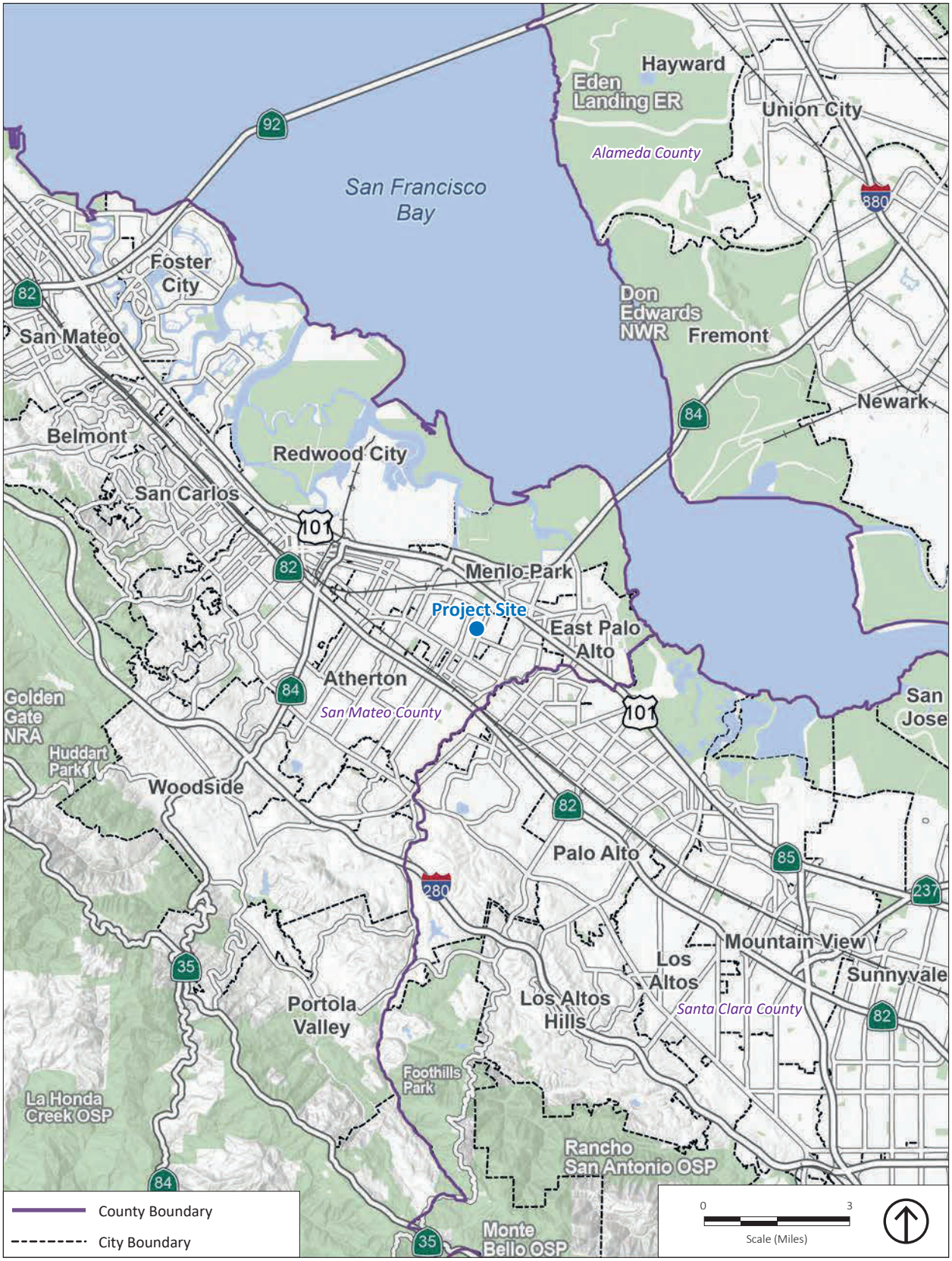
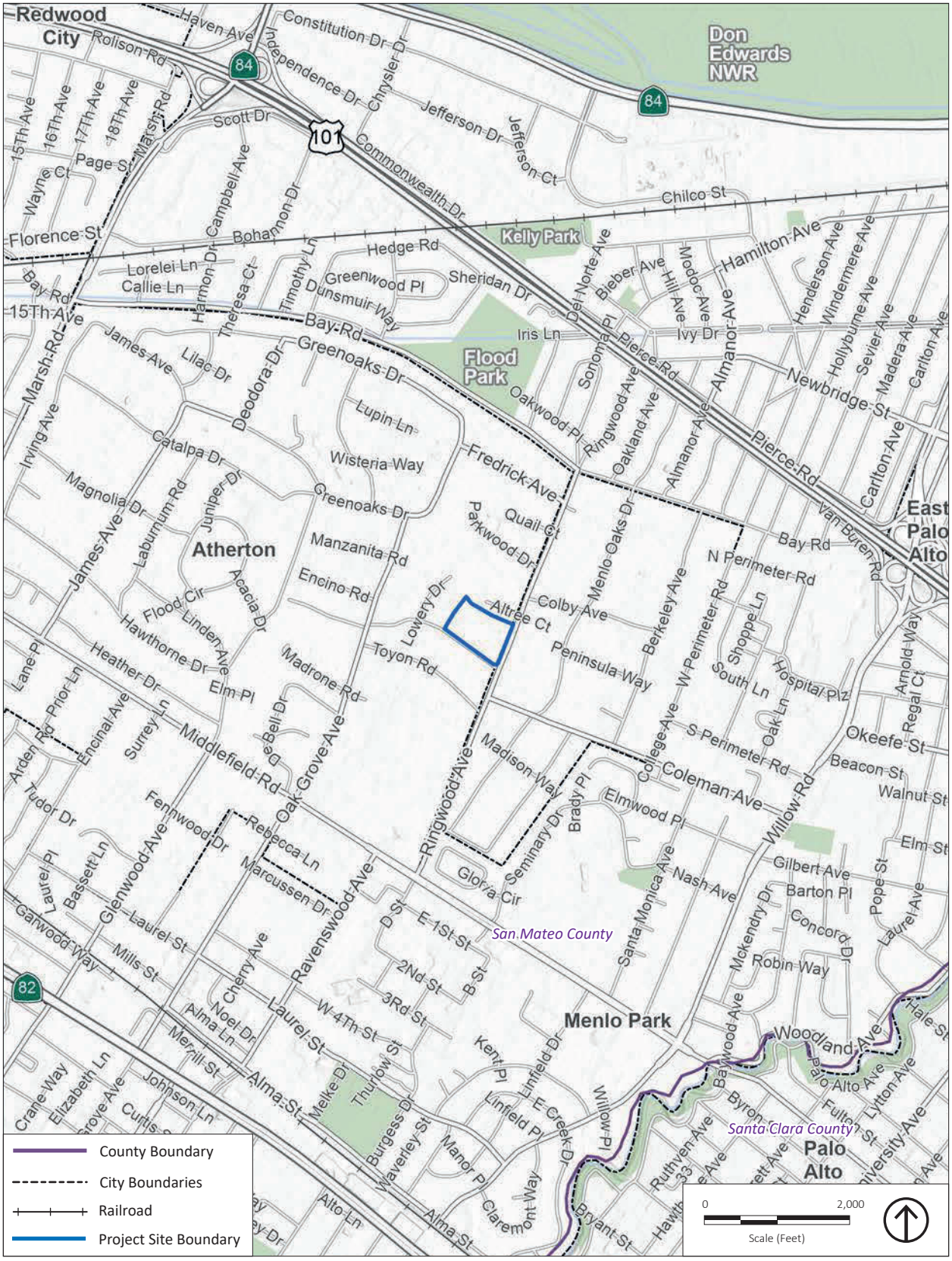
ATTACHMENTS

Figure 1 – Regional Location
Figure 2 – Local Vicinity
Figure 3 – Aerial Photograph
Figure 4 – Site Plan
Figure 5 – Tree Inventory and Removal Plan



Source: Generated using GIS Pro 2026.

Figure 1
Regional Location

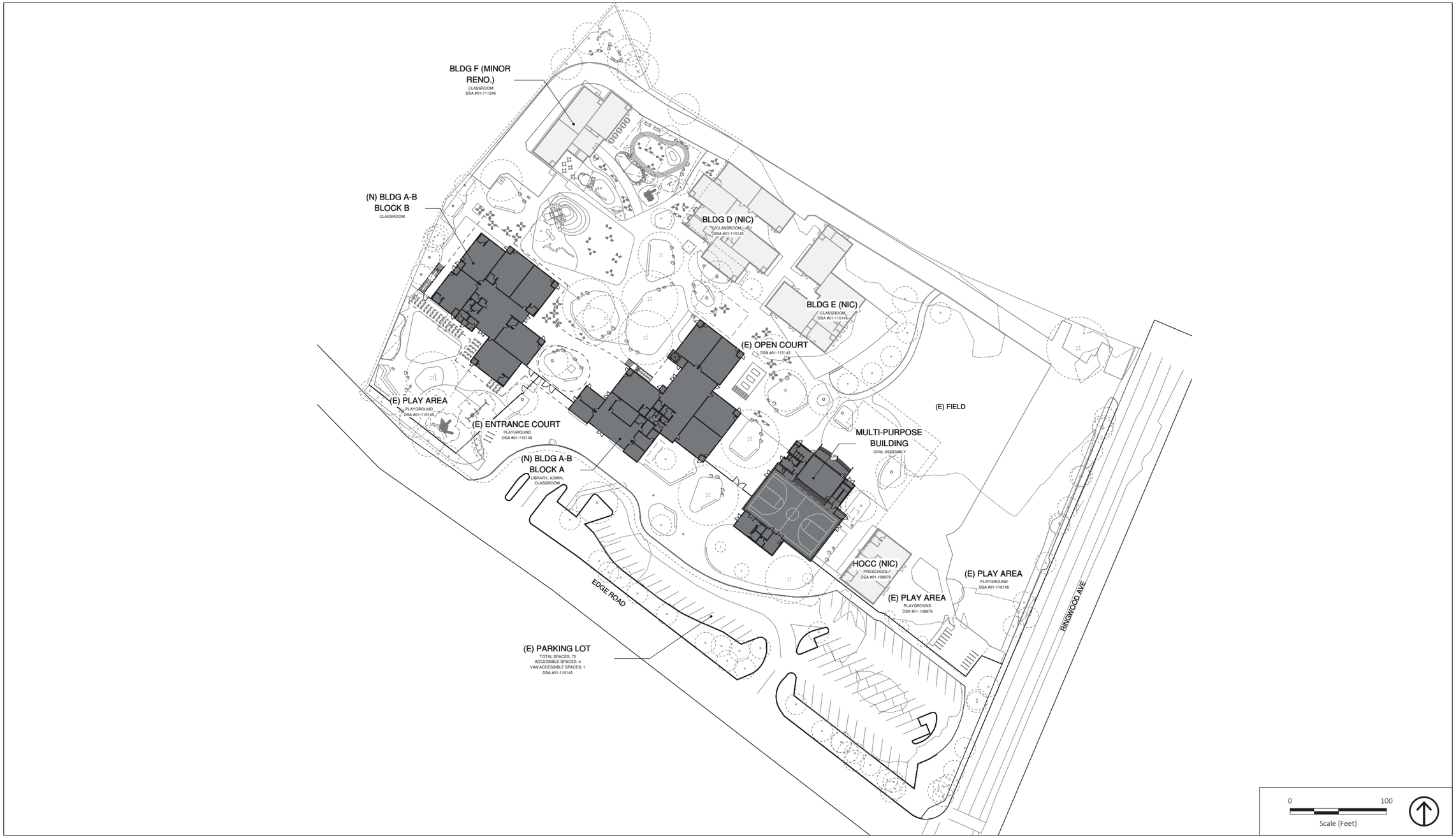


Source: Generated using GIS Pro 2026.

Figure 2
Local Vicinity

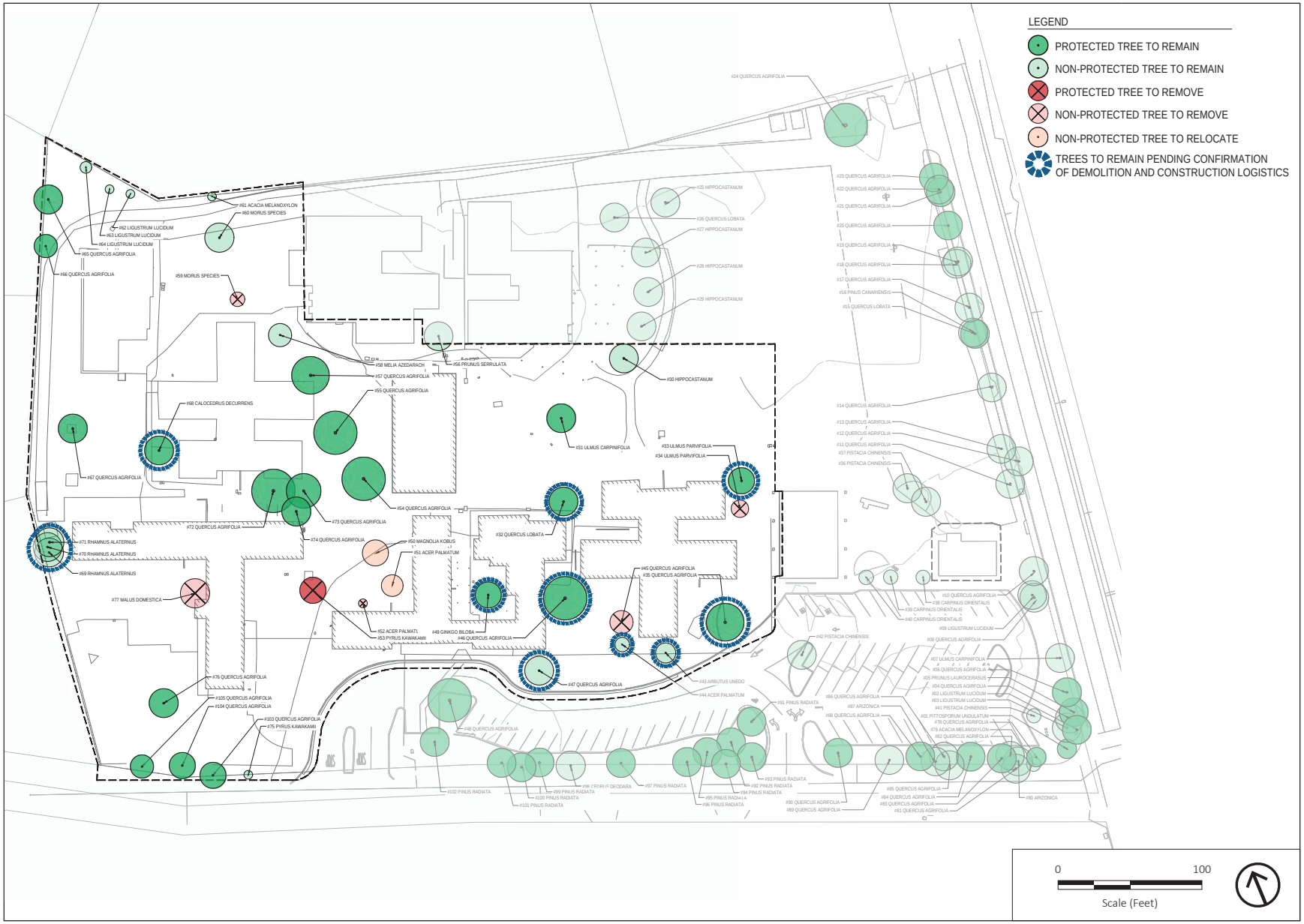
Source: Nearmap 2026.

Figure 3
Aerial Photograph



Source: CAW Architects 2026.

Figure 4
Site Plan



Source: CAW Architects 2026.

Figure 5
Tree Inventory and Removal Plan