

BURLINGAME HIGH SCHOOL MAIN BUILDING HVAC REPLACEMENT PROJECT CEQA EXEMPTION DISCUSSION

Project Description

Existing Facilities

The Burlingame High School, located at 1 Mangini Way in Burlingame is owned and operated by the San Mateo Union High School District. The school is in a commercial and single-family residential neighborhood, with single family houses on Chatham Road and on Oak Grove Road east of Linden Street. The proposed project would be located in the Main Building (“A” Building”), which faces Mangini Way and Carolan Avenue.

Proposed Project

The project would install new roof-mounted HVAC units and ducting in the Main Building on the school campus. Soffit and lighting replacement also would be installed in the.

The project would be constructed over a 3-month period, from June through August 2022.

Categorical Exemption Analysis

The project would be subject to the Class 1 and General Rule exemptions, as discussed below.

Class 1 Exemption

The CEQA Class 1 Exemption applies to minor alteration of existing facilities, including mechanical equipment and electrical conveyances, where there would be negligible or no expansion of capacity (per CEQA Guidelines Section 15301). Installation of additional safety or health protection devices in conjunction with existing structures is also covered under this exemption (Section 15301 (f)).

The project would install a new HVAC system to serve an existing school building, and would not expand the building area or number of classrooms. It also would include accessibility improvements to the parking area, which would increase safety. Therefore, this exemption would apply.

Analysis of Exceptions to Categorical Exemptions

Per CEQA Guidelines section 15300.2, exceptions to the Section 15301 categorical exemption can apply where the following occur:

- Cumulative impact of the same type in the same place, over time is significant.
- Significant effect due to unusual circumstances.
- Damage to scenic resources, including but not limited to, trees, historic

buildings, rock outcroppings, or similar resources, within a state scenic highway.

- Hazardous Waste Sites included on any list compiled pursuant to Section 65962.5 of the Government Code.
- A substantial adverse change in the significance of a historical resource.

As summarized below, none of these exceptions appear to apply to this project and this exemption would apply:

- **Cumulative Impact.** This exception would apply if the project were to contribute to significant impacts to a resource in combination with other proposed new development nearby. While there are other projects proposed at Burlingame High School (i.e., lighting improvement), the proposed HVAC Replacement project would not contribute in a cumulatively considerable manner to any impacts of the other projects at the various schools.
- **Scenic Highways.** This exception would apply if the project were to result in damage to scenic resources within a State-designated Scenic Highway corridor. The project would not be visible in views from off-campus areas, as the new rooftop equipment would be below the Main Building's parapet. In addition, there are no State Scenic Highways in the project area. The project site would not be visible from a designated scenic highway, and is not visible from any roadway, therefore this exception would not apply.
- **Hazardous Waste Sites.** Although a portion of the Burlingame High School Campus is on a listed hazardous waste site due to PCBs and arsenic in the soil (database search performed September 17, 2021), land use covenants would ensure that no hazards would be created to either workers or children/teachers at the building. http://www.envirostor.dtsc.ca.gov/public/profile_report?global_id=41820008. In addition, the proposed work would be entirely above ground in an existing building, so no soil disturbance would occur.
- **Historical Resources.** This exception would apply if the project were to potentially significantly adversely affect an historical resource. Although the Main Building is over 50 years old, the proposed project would involve minor interior renovations associated with new ductwork, as well as the installation of new HVAC units on the roof of the Main Building at the school. This would not alter any potentially historic features of that building.
- **Significant Effect.** The exception would apply if the project would have the potential for a significant effect to the environment due to unusual circumstances. Unusual circumstances may include historic structures, hazardous materials contamination, protected species or habitats, and other similar conditions. There are no unusual circumstances on the existing developed site and there is no potential for significant effect, therefore this exception would not apply.

General Rule Exemption

Where it can be seen with certainty that there is no possibility that the activity in question may have a significant effect on the environment, the activity is not subject to environmental review. In such cases, the activity is covered by the general rule that CEQA applies only to projects that have the potential for causing a significant effect on the environment. (See CEQA Guidelines Section 15061(b)(3)). CEQA Categorical Exemption exceptions do not apply to this exemption. As described above, the proposed project does not have the potential to result in a significant impact to the physical environment. Therefore, this exemption would apply.

Conclusions

As discussed above, the project is within the parameters of the Class 1 Exemption and none of the exceptions to that exemption would apply. In addition, as described above, there is no potential for any significant impacts, so the CEQA General Rule Exemption also would apply to the proposed project.