

# MILLS HIGH SCHOOL PHOTOVOLTAIC SYSTEM PROJECT NOTICE OF EXEMPTION DISCUSSION

## Project Description

### *Existing Facilities*

Mills High School is located at 400 Murchison Drive in the southeastern area of the City of Millbrae adjacent to the City of Burlingame, in San Mateo County. The Mills High School campus is located north of Sequoia Avenue, southeast of Millbrae Avenue, southwest of South Magnolia Avenue, and west and northwest of Murchison Avenue.

The campus is bounded on the northeast by commercial uses located between Magnolia Avenue and El Camino Real; on the northwest by the Millbrae Skate Park and the Millbrae Spur trail which are located between the school and Millbrae Avenue; on the southeast by multi-family residential uses across Murchison Drive, and on the southwest by single-family residences on the other side of Sequoia Avenue.

The proposed solar array sites are on existing parking lots on the southern and western edges of the school.

### *Proposed Project*

The District proposes to install five parking-lot-canopy photovoltaic (PV) systems at two sites on the school campus, along with accessible parking re-striping. Three canopies would be placed on a parking lot on the western side of the campus, and the remaining two would be on another parking lot in front of the school facing Murchison Drive. Twelve trees would be removed on the western parking lot area, and another 10 trees would be removed along the school's Murchison Drive frontage. (seems like 5 of these could be preserved, however all would be landscape species under 25 years of age. The dimensions and locations of the arrays are shown in Table 1, below.

<b>TABLE 1: ARRAY DIMENSIONS, LOCATIONS, AND MODULE COUNT</b>			
<b>Location</b>	<b>Dimensions (feet)</b>	<b>Area (sq. ft)</b>	<b>Module Count</b>
Western Lot	147 x 37	5440	195
Western Lot	91x37	3367	120
Western Lot	113x22	2486	90
Murchison Lot	132x37	4884	175
Murchison Lot	98x37	3626	130
<b>TOTALS</b>		<b>19803</b>	<b>710</b>

These arrays would be tilted, ranging from 14 to 18 feet in height, with a minimum of 13'6" clearance beneath.

The purpose of this project is to provide renewable electricity to the grid and reduce energy costs to the District.

The project would be constructed over between June and December of 2025. No new or expanded uses of the school facilities are proposed as part of this project. One minor project, installation of EV chargers, may overlap with construction of this project.

## **Exemption Analysis**

### *Class 1 Exemption*

The CEQA Class 1 Exemption (Existing Facilities - CEQA Guidelines, Section 15301) applies to repairs and maintenance of existing facilities including interior or exterior alterations involving no or negligible expansion of the facilities, and restoration and rehabilitation of deteriorated structures and facilities, as well as health and safety improvements. The Project qualifies for the Class 1 exemption because it involves the minor alteration of existing facilities at the Property with improvements that would lead to negligible or no expansion of use beyond the use existing at this time. The Project would result in net environmental benefits by reducing traditional electrical energy consumption at the Property.

### *Class 11 Exemption*

The CEQA Class 11 Exemption (Accessory Structures, CEQA Guidelines section 15311) applies to construction or placement of minor structures accessory or appurtenant to existing commercial, industrial, or institutional facilities. The Project is also exempt from CEQA because it involves the construction of minor structures accessory to existing institutional facilities. Although the total area covered is about 20,000 sq. ft., the structures are solely canopies over existing parking lots, so may be considered minor.

### *Analysis of Possible Exceptions to Class 1 and Class 11 Exemptions*

The exemptions are subject to the following exceptions:

- **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. As noted above, project construction may overlap with construction of one minor project, EV charging stations installation. No cumulatively significant impacts would be expected.

- **Scenic Highways.** This exception would apply if the project were to result in damage to scenic resources within a scenic highway corridor. There are also no designated scenic highways with views of the site. The project site is approximately a half of a mile away from U.S. Highway 101 and about 1.25 miles from I-280. The project improvements would not be visible from these highways due to the distance from them and the intervening topography and buildings. El Camino Real is located two blocks east of the site, however, this section of El Camino Real is not designated as a Scenic Road in the San Mateo County General Plan. El Camino Real between Crystal Springs Road in San Mateo and Easton Drive in Burlingame is the only section that is considered a Scenic Road. In addition, a photometrics study was performed for light from under the panels and offsite spillage was determined to be minimal. Therefore, the project would have no potential for significant impact on designated scenic corridors and no significant impact is likely.
- **Hazardous Waste Sites.** This exception would apply if the project were to be located on a hazardous waste site listed pursuant to California Government Code Section 65962.5. A search of the State Envirostor database conducted on April 26, 2024, found no listed hazardous wastes sites on or near the school site. The database shows that a School Investigation was conducted but no action was required<sup>1</sup>. The investigation found no contamination and no action was required by DTSC or the RWQCB. Therefore, although the site is listed on the Cortese List, it is not a hazardous waste site. In addition, no past uses that caused contamination, or actual potential contamination, are known for the school
- **Historical Resources.** This exception would apply if the project were to potentially significantly adversely affect an historical resource. Mills High School was established in 1958 and was recently re-skinned. No buildings would be expanded or demolished for this project. Views of the school frontage from Murchison Drive would be altered to include views of the arrays, however this would not affect any historic resources. Therefore the proposed project would not have the potential to significantly alter the school's historical architectural characteristics.
- **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 site and there is no potential for significant effect, therefore this exception would not apply.

## Conclusions

As discussed above, the project is within the parameters of the Class 1 and 11 exemptions and, as detailed above, none of the exceptions to the exemption would apply. Therefore, this

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<sup>1</sup> [https://www.envirostor.dtsc.ca.gov/public/map/?global\\_id=21880002](https://www.envirostor.dtsc.ca.gov/public/map/?global_id=21880002)

exemption would apply to the proposed project.