

Riverside County
Facilities Management
3450 14th Street, Riverside, CA 92501

NOTICE OF EXEMPTION

March 26, 2024

Project Name: Riverside University Health System Inpatient Treatment Facility (RUHS-ITF) All Wards Emergency Repairs to Restrooms, Showers, and Bathrooms, Riverside

Project Number: FM08430013626

Project Location: 9990 County Farm Road, west of Harrison Street, Riverside, California; Assessor's Parcel Number (APN): 145-120-003

Description of Project: The RUHS In-Patient Treatment Facility is located at 9990 County Farm Road in Riverside, California, 92503. The restrooms are at the "end of life" and the finish materials are posing safety issues to the patients. An assessment by Facilities Management (FM) has determined the facility is not able to meet the concerns of the accrediting organizations that evaluate the facility. The scope of work of the Project included removal and replacement of twenty restrooms, showers, and bathrooms throughout all Wards.

On March 14, 2024, FM issued an emergency declaration pursuant to the authority delegated in Resolution 2003-23 by the Board of Supervisors (Board), allowing immediate action to procure contracts to provide emergency work without competitive bidding. Failure to immediately address the safety hazards in the restrooms, showers, and bathrooms of the ITF would pose imminent risk to the health, safety and welfare of persons and property, or to essential public services, in the forms of: infectious disease control issues, non-compliance of regulatory standards, licensing; and accreditation implications related to California Department of Public Health (CDPH), The Joint Commission (TJC), Center for Medicaid and Medicare Services (CMMS); closure of health care areas, inability to provide adequate health care needs, and loss of county services. The repairs to the Restrooms, Showers, and Bathrooms in all wards of the RUHS-ITF is identified as the proposed project under the California Environmental Quality Act (CEQA). The operation of the facility will continue to provide public services and will not result in a change or expansion of existing use. No additional direct or indirect physical environmental impacts are anticipated.

Name of Public Agency Approving Project: Riverside County Facilities Management

Name of Person or Agency Carrying Out Project: Riverside County Facilities Management

Exempt Status: State California Environmental Quality Act (CEQA) Guidelines Section 15301 Existing Facilities Categorical Exemption; Section 15061(b) (3), General Rule or "Common Sense" Exemption, Codified under Title 14, Articles 5, 18 and 19, Sections 15061 and 15301.

Reasons Why Project is Exempt: The proposed project is categorically exempt from the provisions of CEQA specifically by the State CEQA Guidelines as identified below. The project will not result in any specific or general exceptions to the use of the categorical exemption as detailed under State CEQA Guidelines Section 15300.2. The project will not cause an impact to an environmental resource of hazardous or critical concern nor would the project include unusual circumstances which could have the possibility of having a significant effect on the environment. The project would not result in impacts to scenic highways, hazardous waste sites, historic resources, or other sensitive natural environments, or have a cumulative effect to the environment. No significant environmental impacts are anticipated to occur with the repairs of the restrooms, showers, and bathrooms in all wards s at the RUHS ITF.

- **Section 15301 (b)–Existing Facilities:** This Class 1 categorical exemption includes the operation, repair, maintenance, leasing, or minor alteration of existing public or private structures or facilities, provided the exemption only involves negligible or no expansion of the previous site’s use. The project, as proposed, is limited to the replacement and repairs of the existing restrooms, showers, and bathrooms at the RUHS-ITF. The use of the facilities would continue to provide public services and would not result in a significant increase in capacity or intensity of use. Therefore, the project is exempt as it meets the scope and intent of the Categorical Exemption identified in Section 15301, Article 19, Categorical Exemptions of the CEQA Guidelines.
- **Section 15061 (b) (3) – “Common Sense” Exemption:** In accordance with CEQA, the use of the Common Sense Exemption is based on the “general rule that CEQA applies only to projects which have the potential for causing a significant effect on the environment.” State CEQA Guidelines, Section 15061(b) (3). The use of this exemption is appropriate if “it can be seen with certainty that there is no possibility that the activity in question may have a significant effect on the environment.” *Ibid*. This determination is an issue of fact and if sufficient evidence exists in the record that the activity cannot have a significant effect on the environment, then the exemption applies and no further evaluation under CEQA is required. See *No Oil, Inc. v. City of Los Angeles* (1974) 13 Cal. 3d 68. The ruling in this case stated that if a project falls within a category exempt by administrative regulation or 'it can be seen with certainty that the activity in question will not have a significant effect on the environment', no further agency evaluation is required. With certainty, there is no possibility that the project may have a significant effect on the environment. The proposed repairs to the restrooms, showers, and bathrooms in all wards of the RUHS-ITF will not result in any direct or indirect physical environmental impacts. The improvements would occur within existing facility, would not alter the footprint and are being completed to create a compliant and safe health facility. The use of the facility for public health services would remain unchanged. Therefore, in no way, would the project as proposed have the potential to cause a significant environmental impact and the project is exempt from further CEQA analysis.

Based upon the identified exemptions above, the County of Riverside, Facilities Management hereby concludes that no physical environmental impacts are anticipated to occur and the project as proposed is exempt under CEQA. No further environmental analysis is warranted.

Signed:  Date: 3-26-2024

Mike Sullivan,
County of Riverside, Facilities Management