

**Riverside County**  
**Facilities Management**  
3450 14<sup>th</sup> Street, Riverside, CA 92501

## NOTICE OF EXEMPTION

February 29, 2024

**Project Name:** Ben Clark Training Center (BCTC) Fire Prop Repair Project

**Project Number:** FM08270012565

**Project Locations:** 16902 Bundy Avenue, south of Van Buren Boulevard, Riverside, California 92518; Assessor's Parcel Number (APN): 94-110-005

**Description of Project:** The Riverside County Fire Department uses a 3-story prop tower for training purposes at the BCTC located at 16902 Bundy Avenue, in Riverside, California, 92518. The prop tower is severely rusted and poses a danger to the cadets and their equipment during the live fire drills. The scope of the project includes, but is not limited to, removal of the severely rusted steel and replacement and welding in of new steel. The repairs and improvements to the fire prop tower is defined as the proposed project under the California Environmental Quality Act (CEQA). The operation of the site will continue to provide public services at the existing facility and will not result in a significant expansion of existing use. No additional direct or indirect physical environmental impacts are anticipated.

**Name of Public Agency Approving Project:** Riverside County


**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 Exemption; and Section 15061(b) (3), General Rule or "Common Sense" Exemption, Codified under Title 14, Articles 5 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 improvements and repairs to the damaged fire prop tower at BCTC.

- **Section 15301 (d)–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 improvements and repairs to the damaged fire prop tower at BCTC are needed to restore and maintain an appropriate level of fire training s. The facility provide fire training to various agencies and organizations throughout the region, and the improvements to the existing fire prop facility to maintain training activities are exempt as they meet 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 improvements and repairs to the damaged fire prop tower at BCTC will not result in any direct or indirect physical environmental impacts.

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: 2-29-2024

Mike Sullivan,  
County of Riverside, Facilities Management