

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

NOTICE OF EXEMPTION

March 6, 2024

Project Name: Probation Youth Treatment and Education Center (YTEC), Riverside

Project Number: FM08260013303

Project Locations: 10000 County Farm Road, west of Harrison Street, Riverside, California; Assessor's Parcel Number (APN): 145-120-003

Description of Project: The Probation Riverside Alan M. Crogan Youth Treatment and Education Center (YTEC) is located at 10000 County Farm Road in Riverside, CA 92503. The existing wrought iron perimeter fence is deemed to be insufficient to provide adequate security to protect the YTEC facility or Pathway to Success (PTS) high security units. A section of the outer site perimeter fencing is also damaged and there is fencing in some areas that need to be extended. The scope of work for the Riverside YTEC Security Fencing Project includes, but is not limited to, modification of the existing site security fencing on the east side of the property, installation of a manual vehicular gate, high-security pedestrian gate, and conduits for a future motorized vehicular gate. The improvements to the security fencing at YTEC is identified as the proposed project under the California Environmental Quality Act (CEQA). The operation of the facility will continue to provide probation services and will not result in an 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; Section 15303 New Construction or Conversion of Small Structures Exemption, 15311 Accessory Structures Exemption, and 15061(b) (3), General Rule or "Common Sense" Exemption, Codified under Title 14, Articles 5 and 19, Sections 15061, 15301, 15303, and 15311.

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 security fencing improvements at the YTEC facility.

- **Section 15301 –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 repair of existing fencing to keep the site secure and operating efficiently. The use of the facility would continue to provide probation 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 15303 (e) –New Construction or Conversion of Small Structures:** This Class 3 exemption includes the construction and location of limited numbers of new, small facilities or structures; installation of small new equipment and facilities in small structures; and the conversion of existing small structures from one use to another where only minor modifications are made to the exterior of the structure. Under (e), accessory units, such as fencing are exempt. The project is limited to the repair, replacement, and extension of security fencing at the facility. The extension of security fencing to ensure a secure facility would fall within subsection (e) of the New Construction Exemption and the improvements would not expand service or increase capacity or intensity of use. Therefore, the project is exempt as the project meets the scope and intent of the Categorical Exemption identified in Section 15303, Article 19, Categorical Exemptions of the CEQA Guidelines.
- **Section 15311 – Class 11 Accessory Structure Exemption:** This Class 11 categorical exemption includes the construction, or placement of minor structures accessory to (appurtenant to) existing commercial, industrial, or institutional facilities. The project, as proposed, includes the repairs, improvements, and extension of the existing perimeter fencing around the site to make it secure. The fencing is an accessory structure to provide a secure area. These improvements would be appurtenant to the existing YTEC facility and will not substantially increase or expand the use of the site; therefore, the project is exempt as the project meets the scope and intent of the Class 11 Exemption identified in Section 15311, 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 security fencing improvements will not result in any direct or indirect physical environmental impacts. The use of the facility would remain unchanged, continuing to provide probation services. 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: 3-6-2024

Mike Sullivan,
County of Riverside, Facilities Management

