

County of Riverside  
Facilities Management  
3450 14<sup>th</sup> St., Riverside, CA

FOR COUNTY CLERK USE ONLY

## NOTICE OF EXEMPTION

May 28, 2025

**Project Name:** Single Source Justifications for Countywide KeyWatcher Systems

**Project Number:** 7200300000

**Project Locations:**

Alan Crogan Youth Treatment Education Center (YTEC) – 10000 County Farm Road, Riverside, CA 92503 Assessor's Parcel Number (APN) 145-120-003

Indio Juvenile Hall-47665 Oasis Street, south of Dr. Carreon Boulevard, Indio, CA 92201, APN 614-150-034

Southwest Juvenile Hall-30755-B Auld Road, west of Leon Road, Murrieta, CA 92563, 963-080-013

**Description of Project:** Probation is currently utilizing the proprietary KeyWatcher Touch System by Morse Watchmans, Inc., which provides a secure location for facility keys and other items, all monitored by a computerized system for accountability and security. The County of Riverside has been utilizing this system since 2009, with it currently being in operation at three (3) County facilities and has proven effective in meeting the department's needs. However, a system upgrade and full replacement is necessary at YTEC, as it had reached its end-of-life cycle. In addition, the KeyWatcher Touch System supplies data that allows Probation to track keys being checked-in and checked-out of the facility, including details on who is checking them out and the duration for which they are checked out. The KeyWatcher Touch System also generates reports on unreturned keys, further enhancing accountability and security.

The proposed one-time purchase will include the software that will be needed to perform upgrades to the current system in place at the Indio Juvenile Hall and Southwest Juvenile Hall. In addition, a one-time purchase for the system at YTEC will directly replace the outdated hardware, which is experiencing various mechanical and software issues due to the end-of-life cycle and will be replaced with upgraded equipment. Additionally, Probation will upgrade the software to align with the other two locations, ensuring consistency across all three facilities. The Single Source Justification to provide KeyWatcher system hardware and software services is identified as the proposed project under the California Environmental Quality Act (CEQA). No 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 CEQA Guidelines Section 15301 Existing Facilities Exemption, and Section 15061(b) (3), General Rule or “Common Sense” Exemption. Codified under California Code of Regulations Title 14, Article 5, Sections 15301 and Section 15061.

**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 involve unusual circumstances that could potentially have 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 Single Source Justification for the continued provision of KeyWatcher services.

- **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 approval of the Sole Source Justification does not allow for new construction and is limited to maintenance activities and improvements on existing facilities. The improvements to the existing County facilities are maintenance repairs to keep facilities safe and operational and would not expand the capacity of the site and would result in the continuation of public services; therefore, the project is exempt as the improvements 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 Single Source Justification for the continued provision of KeyWatcher services will not lead to any direct or reasonably indirect physical environmental impacts. The direct effects of the Single Source Justification will have purely administrative impacts. In addition, no significant indirect effects would occur from the approval as the Single Source Justifications do not allow for new construction and are limited to provision of maintenance services at existing facilities, which are exempt under CEQA. 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.

**Signed:** \_\_\_\_\_



**Date:** \_\_\_\_\_

5-28-2025

Mike Sullivan,  
County of Riverside, Facilities Management