

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

## NOTICE OF EXEMPTION

October 16, 2025

**Project Name:** Riverside County Counsel Modular Office Building Replacement

**Project Number:** FM08150014563

**Project Location:** 9991 County Farm Road, west of Harrison Street, Riverside, CA, 92503, Assessor's Parcel Number (APN) 145-240-005

**Description of Project:** The County currently has an existing modular office building located at 9991 County Farm Road in Riverside and adjacent to the Riverside Juvenile Courthouse (Courthouse). Currently County Counsel uses this modular space to conduct business within the Courthouse but this facility is now over 30 years old and has reached the end of its expected useful life cycle.

Through this Project, County Counsel is seeking adequate space to accommodate eight attorneys and two administrative support staff. The County Counsel Modular Building Project scope of work includes, but is not limited to: removing and replacing the existing modular office building with a new modular office building that will accommodate 8-10 offices, one conference room, one storage room, an Information Technology (IT) room with Heating, Ventilation and Air Conditioning (HVAC), counter space for office supplies and copiers, kitchenette/break room, exterior security cameras and access control on exterior doors and IT room, two American with Disabilities Act (ADA) compliant restrooms, as well as providing appropriate parking lot spaces, signage, and an ADA path of travel. The installation of the modular office building at the adjacent to the Courthouse 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 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 Class 1 Existing Facilities Exemption; Section 15303 Class 3 New Construction or Small Structures Exemption; and 15061(b) (3), General Rule or "Common Sense" Exemption, Codified under Title 14, Articles 5 and 19, Sections 15061, 15301, and 15303.

**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 replacement of the modular office building adjacent to the Courthouse.

- 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 existing modular building adjacent to the Courthouse has reached its end of life and the replacement modular building would be within the existing facility footprint and would be consistent with the existing land use. No new substantial capacity would be created by the project. The project includes the installation of a new prefabricated accessory structure under 2,500 square feet. 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. The proposed improvements to the existing facility will not result in any direct or indirect physical environmental impacts. The improvements would require limited construction activity within the existing site and would not alter the function or use of the site or have any external physical effects. The improvements are limited to the replacement of a small modular building and accessibility improvements to maintain the function of the facility. The use and operation of the facility will be substantially similar to the existing use and will not create any new environmental impacts. 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: 10-16-2025

Mike Sullivan, Senior Environmental Planner  
 County of Riverside, Facilities Management