

**City of Paso Robles  
Notice of Exemption**

**To:**  Office of Planning and Research  
1400 Tenth Street, Room 121  
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**From:** City of Paso Robles  
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Paso Robles, CA 93446  
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County Clerk  
County of San Luis Obispo  
County Government Center  
San Luis Obispo, CA 93408

File

**Project Title:** Amendment to Conditional Use Permit 00-020 (AMD 25-02 for the Ravine Water Park)

**Project Applicant:** Damien Mavis, Planning@prcity.com

**Project Location – Specific:** 2301 Airport Road (APN 025-433-012)

**Project Location - City:** Paso Robles      **Project Location - County:** San Luis Obispo

**Project Description:** Amendment to the Ravine Water Park (CUP 00- 020/PD 00-023), to construct an 1879± square foot pool and 153± square foot hot tub with a surround concrete deck and seating area.

**Name of Public Agency Approving Project:** City of Paso Robles

**Name of Person or Agency Carrying Out Project:** Damien Mavis

**Exempt Status:**

- Ministerial (Sec 21080(b)(1); 15268);
- Declared Emergency (Sec 21080(b)(3); 15269(a));
- Emergency Project (Sec 21080(b)(4); 15269(b)(c));
- Categorical Exemption. Class 1, Existing Facilities; CEQA Guidelines 15301, Class 3, New Construction of Small Structures; CEQA Guidelines 15303, and Class 11, Accessory Minor Structures; CEQA Guidelines 15311
- Statutory Exemptions. State code number:

**Reasons why project is exempt:** The project meets all requirements of a Class 1, 3,& 11 categorical exemption and does not meet any exception to a categorical exemption.

Consistent with CEQA Guidelines Section 15300.2, the project does not meet any of the exceptions to a categorical exemption:

- a. *Location. Classes 3, 4, 5, 6, and 11 are qualified by consideration of where the project is to be located – a project that is ordinarily insignificant in its impact on the environment may in a*

*particularly sensitive environment be significant. Therefore, these classes are considered to apply all instances, except where the project may impact on an environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies.*

The work proposed by the Amended Conditional Use Permit and Planned Development is not located on “an environmental resource of hazardous or critical concern” that has been designated, mapped, and adopted by any agencies as it is located on an existing developed site that is currently improved with turf, decompressed granite, concrete walkways, and shade covers.

- b. Cumulative Impact. All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant.*

There are no anticipated cumulative impacts from the work proposed by the Amended Conditional Use Permit and Planned Development of the same type in the same area over time. (CEQA Guidelines § 15003.2(b).)

- c. Significant Effect. A categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.*

There is no “reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.” (CEQA Guidelines § 15003.2(c).) “Unusual circumstances” are those that show the project has some feature that distinguishes it from others in the exempt class, such as its size or location. (Citizens for Environmental Responsibility v. State ex. Rel. 14th Dist. Ag. Assn. (2015) 242 Cal.App.4th 555, 576.) In assessing whether the work proposed by the Amended Conditional Use Permit and Planned Development raises unusual circumstances, it is compared to other normal operations at the Ravine Waterpark. (Id. at 576- 588 [event at fairground was not an unusual circumstance when considered in light of other activities at fairground].)

First, there is nothing unusual about the work relative to projects typically included in the Class 1, 3, and 11 categorical exemptions, particularly in light of the existing facilities at the Ravine Waterpark, where swimming pools and cabanas already exist. This type of repurposing of an approved use area of an existing facility is explicitly called out by the Class 1 categorical exemption, and the Project is squarely within the parameters of that use. Similarly, pools are a listed example of accessory structures under the Class 3 categorical exemption. And, in consideration of the other categories of construction of small structures listed in Class 3 such as single-family residences, multi-family residences, stores, motels, and restaurants, a small pool with accessory facilities is not unusual. Finally, related to the Class 11 categorical exemption, there is nothing to indicate something unusual about work’s characterization as a minor renovation of an existing commercial and recreational use area within an approved facility.

Second, even if there was an unusual circumstance surrounding the work proposed by the Amended Conditional Use Permit and Planned Development, there is no evidence that the work will result in any potentially significant impacts of any kind, let alone a significant impact that is a direct result of some unusual circumstance. The work will occur within an already developed

waterpark which is an already disturbed area and there are no anticipated changes from existing baseline activity levels.

- d. *Scenic Highways. A categorical exemption shall not be used for a project which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state scenic highway. This does not apply to improvements which are required as mitigation by an adopted negative declaration or certified EIR.*

The work proposed by the Amended Conditional Use Permit and Planned Development will not impact resources within a scenic highway, as Highway 46 is not a State designated Scenic Highway and the Project will not impact scenic views, as it is solely repurposing of an existing developed area. (CEQA Guidelines § 15003.2(d).

- e. *Hazardous Waste Sites. A categorical exemption shall not be used for a project located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code.*

The work proposed by the Amended Conditional Use Permit and Planned Development is not located on a property included on any lists for hazard wastes sites. (CEQA Guidelines § 15003.2(e).)

- f. *Historical Resources. A categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource.*

The work proposed by the Amended Conditional Use Permit and Planned Development will not cause a substantial adverse change in the significance of a historical resource as there are no historical resources within the footprint of the work. (CEQA Guidelines § 15003.2(f).)

Therefore, no exceptions to categorical exemption apply, and it is appropriate for the City to find the Amended Conditional Use Permit and Planned Development exempt from CEQA pursuant to CEQA Guidelines section 15301, 15303 and 15311.

Consistent with CEQA Guidelines Section 15301, the project is categorically exempt from CEQA as an existing facility because:

The work proposed by the Amended Conditional Use Permit and Planned Development would repurpose existing facilities within the Ravine Waterpark and fits within the outlined expansions of section 15301(e). Specifically: (1) the total area that will be modified is less than 10,000 square feet; (2) there are existing public services, including City water service, that will continue to serve the Waterpark and the Project; (3) there are no environmentally sensitive areas within the disturbed lawn and concrete areas; and, (4) the Project will not increase the capacity of the existing Ravine Waterpark

Consistent with CEQA Guidelines Section 15303, the project is categorically exempt from CEQA as new construction of small structures because:

The Amended Conditional Use Permit and Planned Development would develop a pool and small accessory facilities, such as the cabanas. This type of project is explicitly described as an example of something that fits within the Class 3 categorical exemption.

Consistent with CEQA Guidelines Section 15311, the project is categorically exempt from CEQA as accessory minor structures because:

The work proposed by the Amended Conditional Use Permit and Planned Development includes features located in an area that is currently utilized by Waterpark guests. The Project is limited to repurposing an existing use area with minor accessory structures. Although pools and associated structures are not explicitly referenced in the exception, the use of the categorical exemption is not limited to those examples. Furthermore, a pool with associated hardscape includes analogous levels of development to a small parking lot, which is listed as an example of a Class 11 categorical exemption. (See CEQA Guidelines § 15311(b).)

**Lead Agency Contact Person:** Piper Smith  
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**Signature:** Piper Smith

**Date:** April 8, 2026

Signed by Lead Agency

Date received for filing at OPR:

Signature: \_\_\_\_\_ Date: \_\_\_\_\_ Title: \_\_\_\_\_

Date received for filing at OPR: \_\_\_\_\_

Authority cited: Sections 21083 and 21110, Public Resources Code

Reference: Sections 21108, 21152, and 21152.1, Public Resources Code