

City of Paso Robles Notice of Exemption

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☒ File

Project Title: Development Plan 25-15 for the Highland's Affordable Senior Apartments – a 30-unit residential development including an affordable housing density bonus.

Project Applicant: The Paso Robles Housing Authority and the Affordable Housing Development Corporation. Laurie Doyle ldoyle@ahdcinc.com

Project Location – Specific: 298 Niblick Road, APN 009-814-044

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

Project Description: The project is 30 affordable multi-family housing units for low-income seniors.

Name of Public Agency Approving Project: City of Paso Robles

Name of Person or Agency Carrying Out Project: The Paso Robles Housing Authority and the Affordable Housing Development Corporation

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 32, Infill Development; CEQA Guidelines Section 15332
- ☐ Statutory Exemptions. State code number:

Reasons why project is exempt: The project meets all requirements of a class 32 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 project qualifies for a Class 32 exemption and does not impact a particularly sensitive environment.

- 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.*

The cumulative impact of residential development in the City is mitigated through the payment of development impact fees that address demands on the City's transportation the projects Infill development has less cumulative effect on the environment than green field development, which interrupts more intact ecosystems outside of already developed areas. The impacts of the build out of the City of Paso Robles were analyzed and mitigated to the maximum extent possible by the EIR of the 2003 General Plan Update. The general plan anticipated development of the site.

- 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 are no unusual circumstances relevant to the impacts of the project, which is designed to avoid biological resources associated with the seasonal creek and related oak woodland.

- 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 site is not within or adjacent to a scenic highway.

- 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.*

No hazardous sites are listed within 1,000 feet of the project in the Department of Toxic Control's EnviroStor database.

- 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.*

No historical resources are located on the property, which is undeveloped. Aerial photographs from 1941 and 1971 indicate the site was similarly undeveloped at those times.

Consistent with CEQA Guidelines Section 15332, the project is categorically exempt from CEQA as an infill development because:

- a. *The project is consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations.*

The property has a General Plan land use category of Regional Commercial (RC), the purpose of which is to "provide for the retail shopping needs of the City and region". The property is in the Regional Commercial Zoning district with a Mixed Use overlay district. The purpose of the Regional Commercial zoning district is "to provide areas where diverse commercial enterprises can work together to meet retail shopping demands locally and regionally." The City Council adopted Ordinance 1106 in 2020 to apply the Mixed Use overlay district to the site "in order to implement the [2019] Housing Element". The ordinance allows purely residential projects in the RC and other commercial districts where the Mixed Use overlay district is applied to "allow residential, commercial, or mixed-use development ... for maximum flexibility".

Land Use Element Policy LU2I is to "[e]ncourage infill development as a means of accommodating growth, while preserving open space areas, reducing vehicle miles traveled, and

enhancing livability/quality of life.” The project would fill a vacant lot along the most traveled arterial street in the City without impacting the adjacent oak-lined seasonal creek. It would provide 30 units of affordable housing for seniors.

- b. *The proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses.*

The property is within the City, is 2.1 acre in size and is surrounded on all sides by developed sites including Niblick Road to the north, an unnamed road and a bank to the west, the Alder Creek apartments to the east and the Highland’s church to the south (separated by an oak-lined seasonal creek). The project avoids any impact to the seasonal creek. No jurisdictional permits from state or federal agencies are required to accomplish the project.

- c. *The project site has no value as habitat for endangered, rare or threatened species.*

A biological report was prepared for a previous project proposed on the site. The report was published as an exhibit to City Council Resolution 21-068. That project proposed a secondary egress driveway that required grading and fill within the seasonal creek. Outside the creek, no significant species were observed. The proposed project would avoid the creek and the oaks adjacent to the creek, which potentially act as a disconnected wildlife corridor located in an urbanized area. The area with potential to provide habitat will not be impacted by the project.

- d. *Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality.*

The project is 30 residential units. The traffic impact study for the project indicates “The proposed project would generate 162 net new vehicle trips per weekday, including 10 AM peak hour trips and 12 PM peak hour trips, below the threshold triggering a traffic capacity analysis per City policy. In addition, the proposed project is expected to have a less than significant impact on vehicle miles traveled (VMT).” The project will be conditioned to limit left turns leaving and entering the site to address safety concerns with those movements.

The project is residential in character and restricted to a senior population. The development will be subject to the City’s Noise Ordinance; no significant noise effects are anticipated.

The San Luis Obispo County Air Pollution Control District has determined that a low-rise apartment project operational in 2027 would need to include more than 88 units to have a significant greenhouse-gas impact and more than 192 units to have a significant ozone-precursor impact (CEQA Air Quality Handbook, 2023). A 30-unit project falls below the thresholds of significance for all air quality metrics of concern in the region.

The project will be required to comply with the Central Coast Regional Water Quality Control Board Post-Construction Stormwater Requirements, which will result in a project that does not have significant impact on water quality.

- e. *The site can be adequately served by all required utilities and public services.*

Water, sewer, electrical, and gas services are available to the site. The General Plan anticipates its development, and public utilities and services (including water, sewer, and solid waste) are designed to accommodate build-out of the General Plan.

Lead Agency Contact Person: Katie Banister
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Signature: Katie Banister

Date: January 23, 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